
PUBLIC PARTICIPATION

FINAL

PROGRAMMATIC

ENVIRONMENTAL IMPACT STATEMENT

FOR THE

DISPOSAL OF DREDGED MATERIAL

IN THE

LONG ISLAND SOUND REGION

APPENDIX E

1982



**US Army Corps
of Engineers**
New England Division

APPENDIX E
COORDINATION AND PUBLIC INVOLVEMENT

COORDINATION AND PUBLIC INVOLVEMENT

Public participation has played an integral role in the scope and development of this Programmatic Environmental Impact Statement (PEIS). Concurrently with other public involvement efforts, Dames & Moore, the Corps contractor tasked with the study of the open water disposal alternative, initiated public involvement by conducting personal interviews of 50 individuals from government representatives, State Environmental and Coastal Zone Management Agencies and various interest groups which have knowledge of or concern with the disposal of dredged material. The responses produced from these interviews are summarized and appended to the Dames & Moore Environmental Impact Report. Other public involvement efforts included scoping meetings, work group meetings with other agencies, and mailings describing the development of the PEIS and requesting comments thereto. These efforts are described more completely in the following paragraphs and pertinent documents are attached as noted. The concerns raised during the development of this PEIS are summarized on Table 1 of the main report.

The following were requested to be "Cooperating Agencies" to assist in the development of this PEIS as suggested in the Council of Environmental Quality, NEPA, Final Regulations (FR 29 November 78) (Attachment 1).

- U.S. Environmental Protection Agency, Region I
- U.S. Environmental Protection Agency, Region II
- National Marine Fisheries Service
- U.S. Fish and Wildlife Service
- U.S. Coast Guard, District I
- U.S. Coast Guard, District III
- Food and Drug Administration, Region I

In addition to the Cooperating Agencies, coordination was also maintained with the Dredging Management Work Group (DMWG), a subcommittee of the Coastal Activities Committee of the New England River Basins Commission (NERBC). This group concerns itself exclusively with the problems related to dredging and the disposal of dredged material. The following agencies are represented on the DMWG:

- New England Division Corps of Engineers
- U.S. Environmental Protection Agency
- National Marine Fisheries Service
- U.S. Fish and Wildlife Service
- New York State Dept. of Environmental Conservation
- Connecticut Dept. of Environmental Protection
- Connecticut Coastal Area Management
- Rhode Island, Office of the Governor
- Interstate Sanitation Commission (New York, New Jersey and Connecticut)
- Massachusetts Coastal Zone Management
- New Hampshire Comprehensive Planning Office

Maine State Planning Office
U.S. Coast Guard, District I
U.S. Coast Guard, District III
Food and Drug Administration, Region I

Due to the study area location, state participation was primarily by New York and Connecticut and to a lesser degree Rhode Island and Massachusetts.

Although the NERBC was disbanded as of October 1982, those agencies maintained their input to the management of dredged material through the Dredging Management Committee setup by the Interim Plan (NERBC 1980) and the public interest review required of all projects. As part of the latter the Federal and State agency representatives meet each month to discuss their concerns and offer their recommendations regarding each proposed project.

As prescribed by the NEPA guidelines for preparation of an EIS, a "Notice of Intent" (Attachment 2) was released to the public 1 March 1979. The distribution for this notice was compiled from mailing lists of various State Agencies and the Corps as well as individual requests and included nearly 600 parties. This notice provided a basic description of the project and requested a show of interest for upcoming scoping meetings and future mailings of project status.

The responses to this notice totaled 162, with 114 planning to attend one or more of these meetings and 48 interested but not planning to attend.

The distribution mailing list was revised to include those parties who responded plus any additional parties who expressed an interest and wished to be kept informed. This list numbered about 200 and was constantly updated as new parties were identified. The present list includes over 300 parties (Attachment 3).

A Public Notice and an "Issue Paper" were released in April for scoping meetings held on 1, 2, 3 May 1979 in Warwick, R.I., New Haven, CT. and Huntington, N.Y (Attachments 4 and 5).

The issues raised at these meetings were summarized and released with the actual meeting notes to the public for their further comment 6 June 1979 (Attachment 6). A verbatim transcript was also available.

Because several questions were raised at the Huntington scoping meeting an additional meeting was held in Huntington 6 June 1979 to further explain the Corps' program and policies with regard to the disposal of dredged material. The prime areas of discussion were research and monitoring programs, the Stamford/New Haven maintenance dredging project and the PEIS.

Attendance at this meeting was by invitation by the Town Supervisor who was provided with a list of persons who had actively participated at the Huntington scoping meeting.

On 11-13 July 1979 the Corps' contractor, Dames & Moore, held a DELPHI session to assign relative importance values to selected derived issues relating to the impacts of open water disposal. A more complete description of this process is included in the Dames & Moore EIR on open water disposal of dredged material which is Appendix A of this PEIS. Members of the research and academic community and personnel from Dames & Moore, the Corps and EPA were participants in this process while representatives of the States of Connecticut, New York and the National Marine Fisheries Service were present as observers. The results of the DELPHI were used by Dames & Moore to develop an environmental suitability map.

On 7 August 1980 the Dredging Management Work Group (DMWG) met to discuss the Delphi results and the environmental suitability map with Dames & Moore and to make recommendations regarding sites which should be studied in more detail.

The primary concerns identified by the DMWG were the need for regional sites throughout Long Island Sound and that priority be given to selecting existing sites where feasible. The site areas to be studied in detail were selected based on regional considerations and location of sources of dredged material as well as environmental suitability.

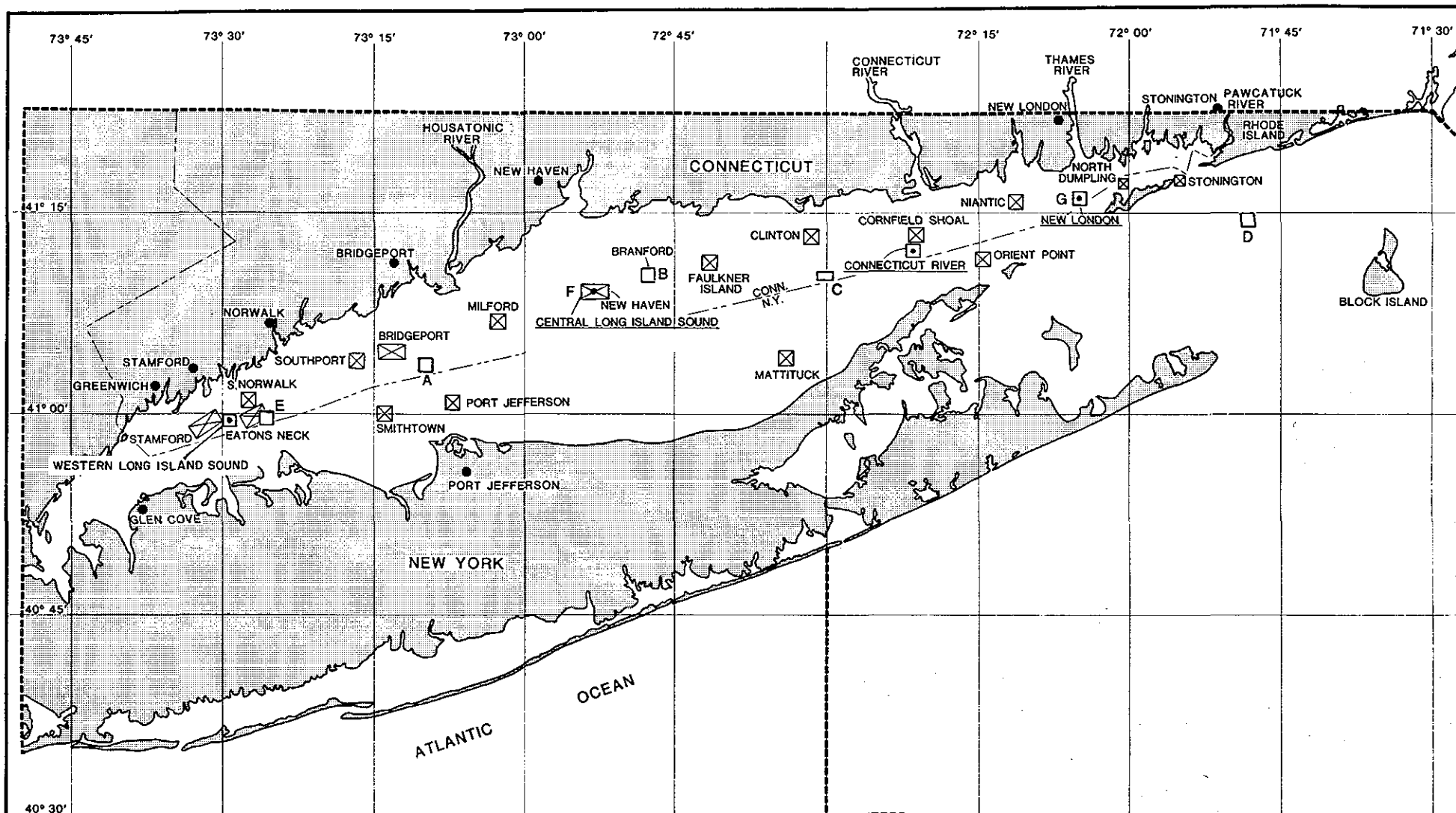
The initial recommendations of Dames & Moore were to perform detailed studies of sites A, B, C, and D (see Fig. 1). The existing interim sites of Central Long Island Sound (Site F) and New London (Site G) were also selected for detailed evaluation to provide comparisons between existing and candidate sites. Site E was added to the list of sites for detailed study in response to the DMWG suggestion for a site in the Norwalk-Stamford region of LIS. The DELPHI results, the environmental suitability map showing the areas selected for further study and a preliminary outline of the PEIS were released 12 October 1979 as a "Status Report" (Attachment 7) for public review and comment. The comments received were forwarded to Dames & Moore for consideration in their report and are treated in the PEIS.

Dames & Moore's draft Environmental Impact Report (EIR) for the open water disposal alternative was received 9 November 1979. Copies were circulated to Cooperating Agencies and to Dredging Management Work Group members for comment. Their comments were forwarded to Dames & Moore, along with the Corps' comments, to be considered in preparation of their final report. Additional coordination included meetings with the Oceanic Society and an attorney for the parties to the out of court agreement, NRDC et al, 1976, (Attachment 1) and two meetings with the DMWG and Cooperating Agencies to discuss the status of the PEIS in general and specifically, to discuss the EIR for the open water disposal alternative with Dames & Moore. Their final EIR was submitted 28 March 1980 and is Appendix A of this PEIS.

The draft PEIS with five appendices was sent to approximately 200 separate entities while the main report only was sent to an additional 400 agencies, organizations and individuals. A total of 52 comments were received in response to this draft during the 45 day review period.

All comments received are included in this final document and are organized into two separate sections. The first section is included in the main report as the comment-response section. In this section specific comments are excerpted from the author's original text and responded to by the Corps. The second section is a compilation of the original comments in their entirety. This section is Attachment 8 to this appendix. In both sections the comments are grouped as Federal, State, local and private and are numbered in the order received.

Many of these comments pointed out the need for a disposal site in Western Long Island Sound. In response to these concerns the Corps undertook a public interest review on a proposed site in that region. This effort resulted in a separate environmental impact statement (EIS) and the identification of a suitable disposal site for dredged material. This site is shown in figure 1 and the details regarding that siting process are included in the Final EIS which was mailed to the public 5 February 1982.



KEY:

- ☒ HISTORICAL SITES
- ☒ ACTIVE REGIONAL SITES
- ☐ POTENTIAL ALTERNATIVE SITES A-E

OPEN WATER DREDGED MATERIAL
DISPOSAL SITES

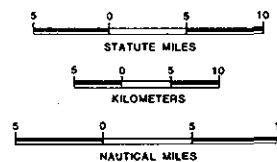


FIGURE 1.

ATTACHMENT 1

Agreement, made this the 28th day of December, 1976, by and between Natural Resources Defense Council, Inc., Environmental Defense Fund, Inc., the Long Island Sound Taskforce, The Fishers Island Civic Association, Inc., Fishers Island Lobstermen's Association, Inc., Connecticut Citizens Action Group, North Fork Environmental Council, Inc., the League of Women Voters of Riverhead-Southold, Plaintiffs; the State of New York and the State of Connecticut, Intervenor; the United States Department of the Navy and the United States Army Corps of Engineers, defendants, by and through their undersigned attorneys:

I. Plaintiffs and Intervenor hereby agree that upon the execution of this memorandum of agreement, they will promptly take action to dismiss with prejudice the case now pending before the United States District Court for the District of Connecticut styled Natural Resources Defense Council, Inc., et al. v. Callaway, No. H-74-268, with each party bearing its own costs, and further agree that the temporary injunction issued therein may be forthwith dissolved. It is further agreed that the Court shall retain jurisdiction for the purpose of adjudication of Plaintiffs' claim for entitlement to attorney's fees incurred in said case.

II. The United States Army Corps of Engineers (hereafter Corps), acting through the Division Engineer, New England Division, agrees to the following:

A. The Corps will proceed as expeditiously as possible to prepare a composite Environmental Impact Statement (CEIS) for the disposal of dredged material from the Long Island Sound Area, and will consider therein the availability of disposal sites in Block Island Sound and other nearby ocean waters. The Corps will endeavor to complete the final CEIS by December 31, 1979.

B. The Corps agrees to seek funding from the Congress for such additional studies of alternative dumping sites as it may deem necessary or appropriate during the processing of the CEIS. The States of New York and Connecticut agree to support any such request of the Corps for such funding.

C. The Corps agrees to proceed expeditiously to designate an alternate disposal site to the New London dumping site in accordance with the conditions in permit number CT-LONG-74-63, dated 29 April 1974, as amended. The Corps also agrees to conduct such field studies, if any, which may, in the opinion of the Corps, be necessary to implement use of such alternative site to be designated.

D. The Corps will take the necessary steps to have the States of New York and Connecticut included as members of the Inter-Agency Scientific Advisory Subcommittee on Ocean Dredging and Spoiling (ISASODS). It further agreed that the Plaintiffs may designate two individuals who shall be given notice of all meetings of ISASODS, and that Plaintiffs' representatives may attend any meeting of ISASODS.

The foregoing provisions will also be incorporated into a memorandum of understanding between the Corps and the States of New York and Connecticut.

III. The Corps will include in its permit to the United States Navy (Navy) for disposal of dredge material from Thames River dredging the following conditions:

A. The Navy will conduct its Phase II dredging operations in a generally North/South direction, subject to the right of the Navy for national defense reasons to request the Corps for such modifications in the dredging as may be necessary to expeditiously complete the project.

B. The Navy will, upon commencement of Phase II dredging continue to monitor the effects of disposal of such dredged material in accordance with the criteria set forth in this

permit, as they may be modified, which monitoring will include radiological, chemical, or equivalent tracing of sediment dispersal and comprehensive biological uptake studies at the dumpsite, unless the Corps, after receipt of recommendations from ISASODS (or if a prompt recommendation from ISASODS is not forthcoming, after consultation with ISASODS), determine that such tracing is inappropriate under the circumstances.

C. The Navy will make available for such monitoring adequate funds to meet the requirements of this permit, provided however, that the funds so to be provided shall not exceed \$500,000 over and above the funds heretofore expended.


IV. The Corps agrees to continue reasonable monitoring of the New London dump site after the completion of Phase II of the Navy's Thames River project, including appropriate monitoring of chronic effects; e.g., sediment movement and biological uptake.

V. It is agreed that the dismissal of the case of NRDC v. Callaway, referred to above, is with prejudice to the right of any party to assert any claim within the subject matter of such litigation, but is without prejudice to the right of any person, including all parties hereto, to bring any court action arising out of proposals for future disposal of dredged material into navigable or ocean waters not within the subject matter of said case.


VI. It is further agreed that this agreement shall be filed for informational purposes with the United States District Court for the District of Connecticut, in conjunction with the dismissal order to be entered in said case.

Made and entered into this the 3rd day of January 1979, by the undersigned Attorneys of Record, who by such signature represent that they have been duly authorized to enter into this agreement.


STATE OF NEW YORK

By 
JOHN F. SHEA III
Assistant Attorney General
State of New York
Two World Trade Center
New York, New York 10047


NATURAL RESOURCES DEFENSE
COUNCIL, INC., ET AL.

By 
ALBERT K. BUTZEL
Attorney for the Plaintiffs
425 Park Avenue
New York, New York 10022

STATE OF CONNECTICUT

By 
BRIAN E. O'NEILL
Assistant Attorney General
P. O. Box 120
Hartford, Connecticut

UNITED STATES DEPARTMENT OF THE NAVY
& UNITED STATES ARMY CORPS OF ENGINEERS

By 
FRED R. DISHEROON
Attorney, Department of Justice
Washington, D. C. 20530

NEDOD-R-13

16 April 1979

Mr. William Adams
Regional Administrator
U.S. E.P.A. - Region I
JFK Federal Building
Boston, MA 02203

Dear Mr. Adams:

The New England Division of the Corps of Engineers is preparing a Composite Environmental Impact Statement and Management Plan for the disposal of dredged material in Long Island Sound, Block Island Sound and adjacent open waters.

I wish to request the participation of your agency in this process as a "cooperating agency" under the Council of Environmental Quality, NEPA, Final Regulations as published in the Federal Register on 29 November 1978 (Section 1501.6).

On 18 December 1978 Mr. Russell Wilder of your agency, was briefed on this project by my staff and our contractor, Dames and Moore, at a meeting of the Interagency Dredging Management Committee of the New England River Basins Commission. May I assume that Mr. Wilder will be our contact for this coordination and will participate in our May scoping meetings?

We look forward to your involvement in this NEPA process.

Sincerely yours,

JOHN P. CHANDLER
Colonel, Corps of Engineers
Division Engineer

Incl

1. Notice of Scoping Meetings
2. Issue Paper

NEDOD-R-13

16 April 1979

Mr. Eckardt C. Beck
Regional Administrator
U.S. E.P.A. - Region II
26 Federal Plaza - Room 1009
New York, NY 10007

Dear Mr. Beck:

The New England Division of the Corps of Engineers is preparing a Composite Environmental Impact Statement and Management Plan for the disposal of dredged material in Long Island Sound, Block Island Sound, and adjacent open waters.

I wish to request the participation of your agency in this process as a "cooperating agency" under the Council of Environmental Quality, NEPA, Final Regulations as published in the Federal Register on 29 November 1978 (Section 1501.6).

Please let me know who will represent your agency for this coordination and will attend our May scoping meetings.

CJL
FOR LAULESS

We look forward to your involvement in this NEPA process.

Sincerely yours,

JOHN P. CHANDLER
Colonel, Corps of Engineers
Division Engineer

Incl

1. Notice of Scoping Meetings
2. Issue Paper

TELEPHONE OR VERBAL CONVERSATION RECORD		DATE
For use of this form, see AR 340-15; the proponent agency is The Adjutant General's Office.		8 JUN 79
SUBJECT OF CONVERSATION		
LIS-EIS COOPERATING AGENCY ROLE - EPA		
INCOMING CALL		
PERSON CALLING	ADDRESS	PHONE NUMBER AND EXTENSION
JOSEPH HUDEK	26 FEDERAL PLAZA NEW YORK NY 10007 ROOM 907	FTS 8-264-9266
PERSON CALLED	OFFICE	PHONE NUMBER AND EXTENSION
W. LAWLESS		
OUTGOING CALL		
PERSON CALLING	OFFICE	PHONE NUMBER AND EXTENSION
PERSON CALLED	ADDRESS	PHONE NUMBER AND EXTENSION
SUMMARY OF CONVERSATION		
<p>In response to our letter re cooperating agency</p> <p>Joe Hudak will be contact for EPA Region II</p> <p>Rus Wilder for EPA Region I</p> <p>EPA will review results of Supping meetings and comment on any additional items to be included in EIS</p> <p>I asked Joe, also, for a statement from EPA for use in EIS discussing 1973 Water Quality Standards, 1976 Criteria, how they came to be why Criteria supplanted Standards & relevance of backup research to 1973 Blue Book. This relates directly to Huntington's concern for water quality impacts and EPA data.</p> <p>A meeting will be scheduled at a later date when most advantageous.</p>		

NEDOD-R-13

16 April 1979

Mr. William Gordon
Regional Director
National Marine Fisheries Service
14 Elm Street
Gloucester, MA 01930

Mr. Gordon:

The New England Division of the Corps of Engineers is preparing a Composite Environmental Impact Statement and Management Plan for the disposal of dredged material in Long Island Sound, Block Island Sound and adjacent open waters.

I wish to request the participation of your agency in this process as a "cooperating agency" under the Council of Environmental Quality, NEPA, Final Regulations as published in the Federal Register on 29 November 1978 (Section 1501.6).

On 18 December 1978 Mr. Michael Ludwig of your agency, was briefed on this project by my staff and our contractor, Dames and Moore, at a meeting of the Interagency Dredging Management Committee of the New England River Basins Commission. May I assume that Mr. Ludwig will be our contact for this coordination and will participate in our May scoping meetings?

We look forward to your involvement in this NEPA process.

CJL
for LAWLESS

Sincerely yours,

JOHN P. CHANDLER
Colonel, Corps of Engineers
Division Engineer

Incl

1. Notice of Scoping Meetings
2. Issue Paper



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Federal Building, 14 Elm Street
Gloucester, Massachusetts 01930

MAY 3 1979

Col. John P. Chandler
Division Engineer
Department of the Army
Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02154

Dear Colonel Chandler:

We have reviewed your letter of April 18, 1979, regarding preparation of a Composite Environmental Impact Statement and Management Plan for the disposal of dredged material in Long Island Sound, Block Island Sound, and adjacent open waters. You request that we participate in this endeavor as a "cooperating agency" in accord with Section 1501.6 of CEQ's Final Regulations as published in the Federal Register of November 29, 1978.

You are correct in assuming that Mr. Ludwig will continue to act as the coordinator between this agency and yours in development of the subject document. In that capacity, Mr. Ludwig will likely attend the scoping meetings scheduled for May.

We appreciate the opportunity to participate in this action, and are willing to assist as a "cooperating agency". We must, however, emphasize that the press of other duties upon our limited staff may at times preclude full participation in all functions related to plan development.

In view of our prior communications on disposal of dredged material in Long Island Sound, and preliminary discussions with your staff and representatives from Dames and Moore, we do not presently plan to make a public statement at any of the scheduled meetings. Should this be counter to your desire, please feel free to discuss the matter with Mr. Ludwig.

Sincerely,

Warvin F. Bousan

for

Robert W. Hanks
Acting Regional Director



NEDOD-R-13

18 April 1979

Mr. Howard Larsen
Regional Director
U.S. Fish and Wildlife Service
1 Gateway Center
Newton, MA

Dear Mr. Larson:

The New England Division of the Corps of Engineers is preparing a Composite Environmental Impact Statement and Management Plan for the disposal of dredged material in Long Island Sound, Block Island Sound and adjacent open waters.

I wish to request the participation of your agency in this process as a "cooperating agency" under the Council of Environmental Quality, NEPA, Final Regulations as published in the Federal Register on 29 November 1978 (Section 1501.6).

On 18 December 1978 Mr. David Riley of your agency, was briefed on this project by my staff and our contractor, Dames and Moore, at a meeting of the Interagency Dredging Management Committee of the New England River Basins Commission. May I assume that Mr. Riley will be our contact for this coordination and will participate in our May scoping meetings?

CJC
FOR LAWLESS

We look forward to your involvement in this NEPA process.

Sincerely yours,

JOHN P. CHANDLER
Colonel, Corps of Engineers
Division Engineer

Incl

1. Notice of Scoping Meetings
2. Issue Paper



IN REPLY REFER TO:

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
One Gateway Center, Suite 700
NEWTON CORNER, MASSACHUSETTS 02158

11 JUN 1979

Colonel John P. Chandler
Division Engineer
Department of the Army
New England Division, Corps of Engineers
424 Trapelo Road
Waltham, MA 02154

Dear Colonel Chandler:

This responds to your April 18, 1979 letter regarding Service participation as a cooperating agency for the preparation of the Composite Environmental Statement and Management Plan for the disposal of dredged material in Long Island Sound, Block Island Sound, and adjacent open waters.

As you know, we are deeply concerned with the environmental implications of open water spoil disposal and we appreciate the opportunity to actively participate in the EIS development process. Unfortunately we were unable to attend the project associated scoping meetings and we are concerned that our involvement as a cooperating agency may be beyond our immediate funding and manpower capabilities.

Therefore, we would like to meet with you and/or members of your staff as soon as possible in order to determine the scope of our potential involvement and, if appropriate, to discuss the possibility of lead agency funding as provided in 40 CFR 1501.6(5).

Please contact Carl Schwartz of my staff (FTS 829-9217) to establish a satisfactory meeting date.

Sincerely yours,

Regional Director

NEDOD-R-13

18 April 1979

SUBJECT: Request for Coordinating Agencies

Commander
First Coast Guard District
150 Causeway Street
Boston, MA 02114

1. The New England Division of the Corps of Engineers is preparing a Composite Environmental Impact Statement and Management Plan for the disposal of dredged material in Long Island Sound, Block Island Sound and adjacent open waters.
2. I wish to request the participation of your agency in this process as a "cooperating agency" under the Council of Environmental Quality, NEPA, Final Regulations as published in the Federal Register on 29 November 1978 (Section 1501.6).
3. Please let me know who will represent your agency for this coordination and will attend our May scoping meetings.
4. We look forward to your involvement in this NEPA process.

CSL
for LAWLESS
B
Jm

JOHN P. CHANDLER
Colonel, Corps of Engineers
Division Engineer

Incl

1. Notice of Scoping Meetings
2. Issue Paper

NEDOD-R-13

18 April 1979

SUBJECT: Request for Coordinating Agencies

Commander
Third Coast Guard District
Governors Island
New York, NY 10004

1. The New England Division of the Corps of Engineers is preparing a Composite Environmental Impact Statement and Management Plan for the disposal of dredged material in Long Island Sound, Block Island Sound and adjacent open waters.
2. I wish to request the participation of your agency in this process as a "cooperating agency" under the Council of Environmental Quality, NEPA, Final Regulations as published in the Federal Register on 29 November 1978 (Section 1501.6).
3. Please let me know who will represent your agency for this coordination and will attend our May scoping meetings.
4. We look forward to your involvement in this NEPA process.

*CSL
for LAWLESS*

JOHN P. CHANDLER
Colonel, Corps of Engineers
Division Engineer

Incl

1. Notice of Scoping Meetings
2. Issue Paper

TELEPHONE OR VERBAL CONVERSATION RECORD		DATE
For use of this form, see AR 340-15; the proponent agency is The Adjutant General's Office.		27 Apr 79
SUBJECT OF CONVERSATION		
CEIS-LIS Cooperating Agencies		
INCOMING CALL		
PERSON CALLING	ADDRESS	PHONE NUMBER AND EXTENSION
Bob Dealy	US Coast Guard Boston	
PERSON CALLED	OFFICE	PHONE NUMBER AND EXTENSION
W. Lawless		
OUTGOING CALL		
PERSON CALLING	OFFICE	PHONE NUMBER AND EXTENSION
PERSON CALLED	ADDRESS	PHONE NUMBER AND EXTENSION
SUMMARY OF CONVERSATION		
<p>Ref our request of 4.18.79 for Cooperating Agency participation</p> <p>Contact should be with</p> <p>Mr. Jay Silberman 3rd U.S. Coast Guard District District Planning Office Governor's Island New York NY 10004 FTS 8-664-7001</p> <hr/> <p>Call Mr. Silberman for coordination (called this date)</p> <p>Send him all correspondence to date</p> <ol style="list-style-type: none"> 1. 18 Apr 79 ltr requesting coop. agency partic. 2. Issue paper <p>Verify his participation in scoping process</p> <p>He asked us to send package to</p> <p>Commander (DPL) 3rd Coast Guard District District Governor's Island New York NY 10004</p> <p>Attn: Mr. Jay Silberman District Planning Office</p>		

NEDOD-R-13

18 April 1979

Mr. Arthur J. Beebe
Regional Food and Drug Director - Region I
585 Commercial Street
Boston, MA 02109

Dear Mr. Beebe:

The New England Division of the Corps of Engineers is preparing a Composite Environmental Impact Statement and Management Plan for the disposal of dredged material in Long Island Sound, Block Island Sound and adjacent open waters.

I wish to request the participation of your agency in this process as a "cooperating agency" under the Council of Environmental Quality, NEPA, Final Regulations as published in the Federal Register on 29 November 1978 (Section 1501.6).

Please let me know who will represent your agency for this coordination and will attend our May scoping meetings.

We look forward to your involvement in this NEPA process.

*CSC
for LAWLESS*

Sincerely yours,

JOHN P. CHANDLER
Colonel, Corps of Engineers
Division Engineer

Incl

1. Notice of Scoping Meetings
2. Issue Paper



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
PUBLIC HEALTH SERVICE
FOOD AND DRUG ADMINISTRATION

BOSTON FIELD OFFICE
585 COMMERCIAL STREET
BOSTON, MASSACHUSETTS 02109
TELEPHONE: 617-223- 1278

May 8, 1979

Colonel John P. Chandler
Division Engineer
Corps of Engineers
424 Trapelo Road
Waltham, MA 02154

Dear Colonel Chandler:

This is in follow-up to your letter of April 18, 1979 requesting that FDA be represented at your Public Scoping Meetings on disposal of dredge material in Long Island Sound, Block Island Sound, and adjacent waters. Captain James Verber, Chief, Northeast Technical Services Unit, PHS, FDA, Davisville, R.I. attended the May 1, 1979 meeting at Warwick, R.I. At that meeting, Captain Verber made a statement for the record identifying FDA's concerns on this matter.

Thank you for your invitation.

Sincerely yours,

Arthur J. Beebe, Jr.
Regional Food & Drug Director
FDA, Region I

ATTACHMENT 2



DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION, CORPS OF ENGINEERS
424 TRAPELO ROAD
WALTHAM, MASSACHUSETTS 02154

REPLY TO
ATTENTION OF:
NLIDUX

1 March 1979

NOTICE OF INTENT

TO: All Interested Government Agencies, Public Groups, and
Individual Citizens

This is a notice to all interested parties that the U.S. Army Corps of Engineers, New England Division, is preparing an environmental report on the disposal of dredged materials in Long Island Sound, Block Island Sound and adjacent ocean waters. A complete survey and study of all feasible disposal sites within those waters is being conducted. This environmental report will contribute to and become a part of a Composite Environmental Impact Statement and Management Plan which are intended to address the broader aspects of the disposal or deposition of dredged materials from the Long Island Sound Region.

During the week of March 26th, 1979, the Corps will conduct public meetings to solicit comments, identify issues, and to encourage participation by all interested parties in the development of this environmental report and EIS. These public scoping meetings are required by, and further described in, Section 1501-7 (Scoping) of the Council on Environmental Quality's implementation of procedural provisions and final regulations to the National Environmental Policy Act as published in the Federal Register on November 29, 1978 (Part VI). These public scoping meetings will be an open process for determining the scope of issues to be addressed and for identifying the significant issues related to the disposal of dredged materials within these waters and this region.

If you will attend these meetings or if you wish to receive additional information on the preliminary issues to be discussed


NEDDX
Notice of Intent

1 March 1979

and the proposed action, please complete and mail the attached form by March 9th, 1979. You will then receive additional information on this study and notification of the dates, times, and locations of the meetings. Your participation is encouraged.

Sincerely,

Incl
as stated



JOHN P. CHANDLER
Colonel, Corps of Engineers
Division Engineer

This form will be available at the entrance to the meeting to assist those that wish to speak or submit a written statement. The form is provided here to assist in the preparation of statements prior to the meeting.

NAME:
ADDRESS:

AFFILIATION (IF ANY):

STATE THE ISSUE OR AREA OF CONCERN:

PREVIOUS OR POTENTIAL IMPACTS:

SOLUTION TO THE PROBLEM (OR HOW CAN THE IMPACTS BE MINIMIZED):

PLEASE PRINT

I will not attend a meeting, but please send additional information for my review and comment.

I will plan to attend the meeting in:
(you may check more than one)

Providence, RI
New Haven, CT
Huntington, Long Island

I prefer that the meeting be held:
(please check more than one)

Morning
Afternoon
Evening

NAME:
ADDRESS:

ORGANIZATION/AFFILIATION/OR SPECIAL INTEREST:

REMARKS - SUGGESTION:

SIGNATURE _____

ATTACHMENT 3

FEDERAL AGENCIES

Mr. Jim Brickett, Jr.
Captain of the Port
USCG Group L.I.S.
120 Woodward Avenue
New Haven, CT 06512

Mr. Robert Daley
First Coast Guard District
(dpl)
150 Causeway Street
Boston, MA 02114

Mr. Steven P. Dummings
Port Security Investigator
USCG Group L.I.S.
120 Woodward Avenue
New Haven, CT 06512

Commander John Harold, USCG
Commander, USCG, Group L.I.S.
120 Woodward Avenue
New Haven, CT 06512

C.A. Huber
Lieutenant Commander, USCG
Superintendent (ds-1)
U.S. Coast Guard Academy
New London, CT 06320

Commander Bruce Lauther, USCG
District Planning Officer
5 Commander, Third CG Dist.
Governors Island
New York, NY 10004

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Mr. Leonard J. Stasiukiewicz
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CT River Watershed Council
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ATTACHMENT 4



DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION, CORPS OF ENGINEERS
424 TRAPELO ROAD
WALTHAM, MASSACHUSETTS 02154

REPLY TO
ATTENTION OF:
NEDOD-R-20

16 April 1979

N O T I C E

PUBLIC SCOPING MEETINGS
COMPOSITE ENVIRONMENTAL IMPACT STATEMENT
DISPOSAL OF DREDGED MATERIAL IN LONG ISLAND SOUND
BLOCK ISLAND SOUND AND ADJACENT WATERS

Significant issues related to placing dredged materials in Long Island Sound, Block Island Sound, and adjacent waters will be discussed at three public meetings rescheduled for the first week of May by the U.S. Corps of Engineers.

The meetings will be in Warwick, Rhode Island, on May 1st, New Haven, Connecticut, on May 2nd, and at Huntington Station, Long Island, on May 3rd.

We invite you to attend and give your comments, identify issues, and participate in the development of an environmental impact statement on the deposition of dredged materials in Long Island and Block Island Sounds and adjacent ocean waters.

The Warwick session will open at 1:00 p.m. at the Howard Johnsons on Jefferson Boulevard, on May 1st. The Holiday Inn West at 1605 Whalley Avenue in New Haven will be the location of the 7:00 p.m. meeting on May 2nd. On Long Island, the meeting will begin at 7:00 p.m. May 3rd in the Huntington Elementary School on Lowndes Avenue, Huntington Station.

These public scoping meetings will be an open process for determining the scope of issues to be addressed and for identifying the significant issues related to the disposal of dredged materials within these waters and this region.

The overall study and these public meetings will have no effect at this time on any on-going, permitted dredging activity in the area, including the Stamford-New Haven Harbor dredging currently underway.

An issue paper giving additional information will be mailed to you in the next few days. If you have any questions, please contact Mr. William Lawless or Major Robert Hando at the New England Division, U.S. Army, Corps of Engineers, 424 Trapelo Road, Waltham, Massachusetts 02154, telephone 617-894-2400, extension 271.

ATTACHMENT 5



DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION, CORPS OF ENGINEERS
424 TRAPELO ROAD
WALTHAM, MASSACHUSETTS 02154

REPLY TO
ATTENTION OF:
NEDOD-R-1

18 April 1979

ISSUE PAPER FOR
PUBLIC SCOPING MEETINGS FOR THE COMPOSITE
ENVIRONMENTAL IMPACT STATEMENT FOR MANAGEMENT OF
DISPOSAL OF DREDGED MATERIAL IN LONG ISLAND SOUND,
BLOCK ISLAND SOUND AND ADJACENT WATERS

In response to Regulations published on 29 November 1978, by the President's Council on Environmental Quality, the Corps of Engineers will conduct Public Scoping meetings at three locations during the first week of May as follows:

- 1 May - 1:00 pm - Howard Johnson's, Warwick, Rhode Island
- 2 May - 7:00 pm - Holiday Inn West, New Haven, Connecticut
- 3 May - 7:00 pm - Huntington Elementary School, Huntington Station, New York

Scoping meetings as outlined in the CEQ regulations are intended to "...assist agencies in deciding what the central issues are, how long the EIS shall be, and how the responsibility for the EIS will be allocated among the lead agency and the cooperating agencies."

In this particular case, we are preparing an EIS to address on a regional basis the impacts related to open water disposal of dredged material. This is partly in response to an agreement reached among parties involved in NRDC, et al v. Callaway (No. H-74-268) which case involved dredging by the Navy in the Thames River and disposal of dredged material at the New London Disposal Site off the mouth of the Thames River.

We recognize that the issue of disposal of dredged material spans many agencies, many public interest groups, many geographic regions, and many political boundaries. A large part of the solution to problems related to dredging and disposal of dredged material lie in the states' views of their coastal zone management initiatives. The Corps of Engineers is in no position to take the lead in this area. However, there are immediate problems at hand relative to disposal of dredged material for which long term policy must be considered at this time. Since there are no specific plans in any of the States to deal with disposal of dredged material, we propose to address the problem to the extent we can without pre-empting states' prerogatives; i.e., we plan to address open water disposal options.

Further, we recognize that limiting the examination to open water areas fails to give full consideration to all alternatives. In that regard, we have recommended to the New England River Basins Commission that they serve as a focal point for the States to input their own management plans for land alternatives. The States, through New England River Basins Commission, would fully develop these alternatives in a further EIS. The EIS for which these scoping meetings are being held and the subsequent NERBC effort would then become "tiered" with other project specific statements to use in the decision making process on the individual projects.

CEQ Regulations describe "tiering" as, "...coverage of general matters in broader environmental impact statements with subsequent narrower statements..." and should be used, "...when it helps the lead agency to focus on the issues which are ripe for decision..." In this instance, we intend for the EIS to be broad and programmatic in nature to address open water disposal.

We are soliciting the public's ideas on all factors affecting dredging and disposal, including the need for the dredging and environmental, economic, and social impacts of dredging, disposal, and of failing to do either. When you present your views, we would appreciate your indicating whether you believe the issues you raise are appropriate for the subject EIS, the later NERBC work, or future project specific evaluation.

Background of Open Water Disposal in Long Island Sound

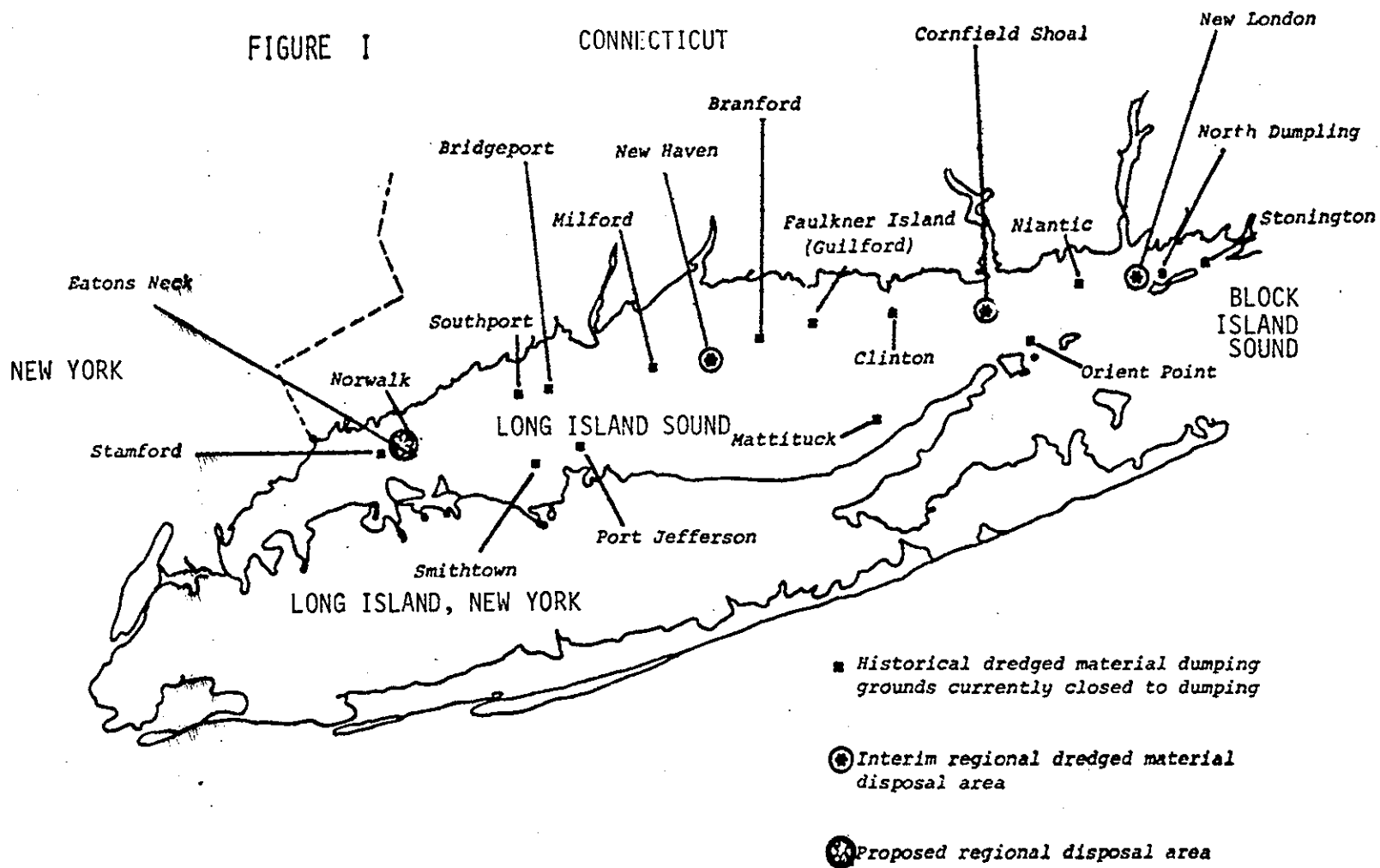
Prior to 1974, there were 19 sites identified and used for disposal of dredged materials in Long Island Sound. For the several years following, disposal policy was in limbo due to concerns about lack of specific evaluations of impacts. In 1976, in recognition of the need to resolve disposal issues, the Connecticut Department of Environmental Protection and the New York Department of Environmental Conservation drafted an interim plan for management of open water disposal. While the plan was never formally adopted, it has led the way in the decision making process in the intervening years.

The plan outlined general types of materials to be considered suitable for disposal in the Sound and identified four locations of regional disposal sites. Three of those sites are actively being used. Use of a fourth site has been deferred pending the outcome of this EIS. Figure 1 shows the original 19 sites and the three which are currently used.

Concurrent with the states' developing an interim management plan, extensive research on disposal impacts has been done throughout the nation, much of it within Long Island Sound, Block Island Sound and adjacent waters. We have contracted with a consulting firm to collect and consolidate the available research and other information and prepare an Environmental Impact Report on their findings. The geographic limits of the study area are shown on Figure 2. The EIR will serve as part of the base information for the EIS. The objective of the EIR is to identify the various environmental parameters and assess their relative importance throughout the study region. Also included in the report will be an identification of methods of deposition and management practices which may be available.

In a separate, but related study, we are preparing a report at the request of Congress on the feasibility of constructing a containment site for dredged material from Federal dredging projects in Connecticut. Sites to be considered include shoreline extensions, nearshore, and offshore island creation. This study will be closely coordinated with the EIS effort and with the subsequent NERBC effort.

Based on input from these scoping meetings, we will develop the scope and coordinate it with all interested agencies prior to drafting the EIS.



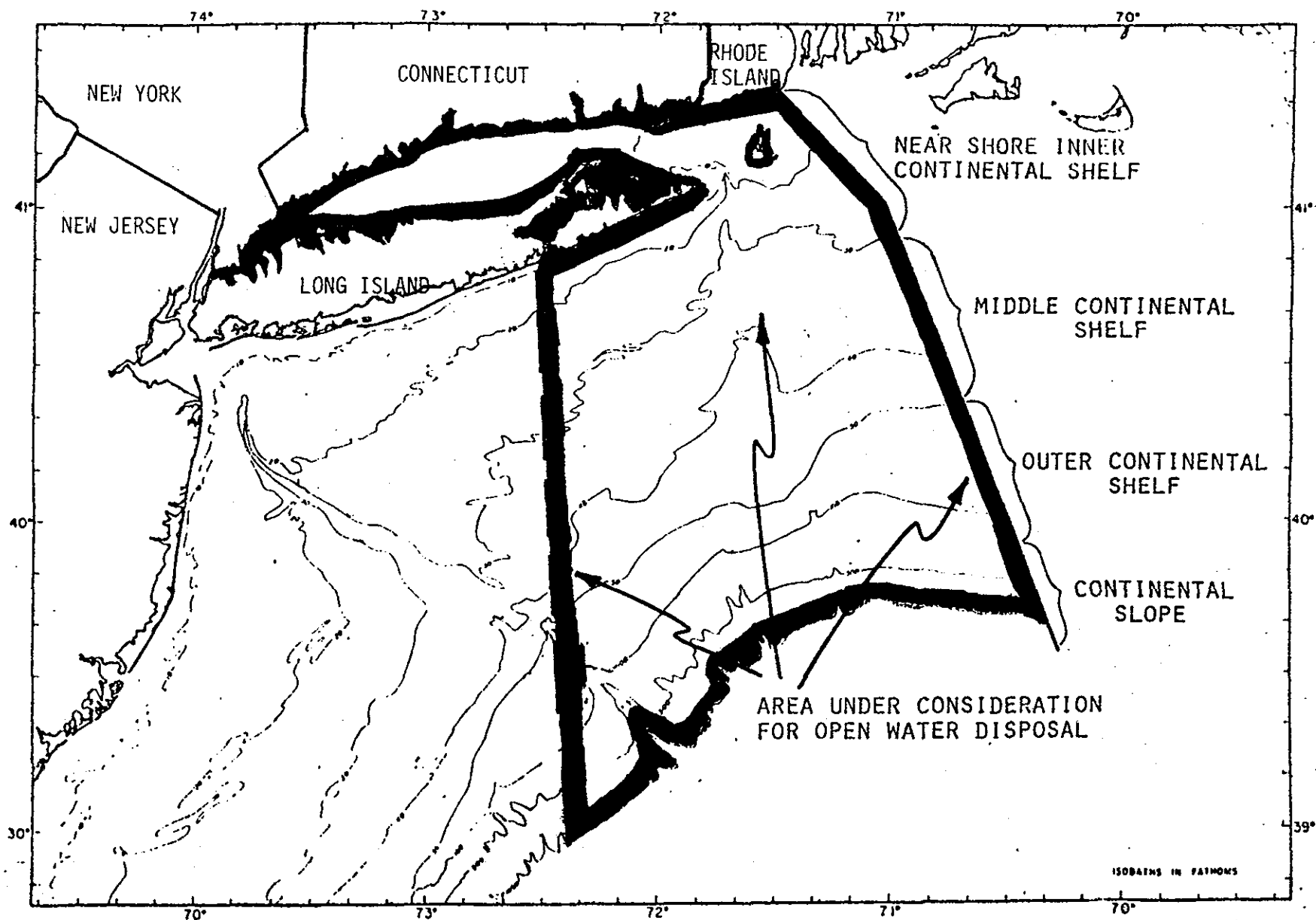


FIGURE 2

ATTACHMENT 6



DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION, CORPS OF ENGINEERS
424 TRAPELO ROAD
WALTHAM, MASSACHUSETTS 02154

REPLY TO
ATTENTION OF: NEDOD-R-20

SUMMARY OF CORPS OF ENGINEERS
PUBLIC SCOPING MEETINGS
COMPOSITE ENVIRONMENTAL IMPACT STATEMENT
MANAGEMENT OF DISPOSAL OF DREDGED MATERIAL IN
LONG ISLAND SOUND, BLOCK ISLAND SOUND, AND
ADJACENT WATERS

Attached is a summary of the concerns raised at the Public Scoping Meetings held on May 1, 2, 3 at Warwick, Rhode Island; New Haven, Connecticut; and Huntington Station, New York.

The significant issues to be analyzed in depth in the environmental impact statement are listed in Part A. Part B is a list of items that will be covered elsewhere or are not significant, including the corresponding rationale. Also attached are photo reductions of the issue flip charts we developed at the meetings.

We invite your detailed comments on this summary regarding any concerns you feel we missed or did not fully understand. The scoping process can serve its purpose only if your concerns have been correctly understood and addressed.

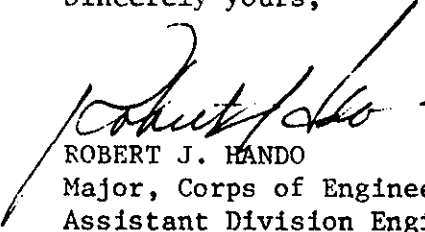
Further comments should be mailed to

U.S. Army, Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02154

ATTN: Mr. William F. Lawless
Project Manager
Operations Division

Following an analysis of all concerns raised, we will begin addressing the significant issues. A draft environmental impact statement will be available for review and comments prior to preparing the final statement. We value your continued interest and participation in this complex and controversial subject.

Sincerely yours,


ROBERT J. HANDO
Major, Corps of Engineers
Assistant Division Engineer

PART A

SIGNIFICANT ISSUES - To be treated in depth in CEIS

Boundaries of Study Area	Management Plan
Capping	Mining of Sand
Coastal Area Management Program	Navigation
Costs	Oysters
Dredged Material	Recreational Boating
Dredging Needs	Shellfish Contamination
Employment	Site Selection
Fisheries	Studies by Others
Health Effects	Water Quality
Long Island Sound	

Boundaries of Study Area

Discuss the rationale for selecting the study area boundaries.

Recognize that the eastern boundary is well used for fisheries.

Several concerns were raised regarding the Continental Slope:

it is an area of intense activity; should the entire slope be included or just out to 100 fathoms; consider National Marine Fisheries Service concerns; is it economically and technically feasible to dispose of dredged material on shelf; consider the costs to fisheries if shelf is used for disposal.

Compare nearshore and offshore environments with respect to commercial and recreational species.

Capping

Evaluate sources of capping material and stability of capping method.

Describe monitoring, enforcement, and controls of capping. What is the effect of the time lapse between disposal and capping? Capping is an unproven technique. If it proves unsuccessful, can contamination be stopped?

Coastal Area Management Program of the State of Connecticut seeks a balance between boating and fisheries uses of the water resources.

Costs

Consider all costs - costs to fisheries, transport costs, and costs to small operators. What is the economic impact to boating and commerce if disposal in Long Island Sound is stopped. Consider long term health costs.

Dredged Material

Classify and map sediment types. Analyze existing sediment data, pollutants, and toxicity. Inventory discharges into receiving waters using EPA data.

Dredging Needs

Consider authorized vs. needed channel depths to minimize dredging. Consider long term transportation/harbor use planning relative to dredging needs; for example: deep draft vessels use one harbor, shallow draft vessels use another. Consider dredging needs as expressed by the Norwalk Abatement Committee. Discuss oil spill risks resulting from inadequate dredging. One result of inadequate dredged depths for petroleum carrying vessels would be increased trucking.

Employment

Evaluate effects on onshore and offshore employment from disposal of dredged material in open waters.

Fisheries

Norwalk has a presently productive lobster fishery. Identify the specific area and productivity of this fishery. Evaluate the impacts to fisheries at existing disposal sites. Record the present productivity of marine life and compare with any past reference data if available. Identify areas dragged by fishermen and barren areas. Coordinate with the Connecticut Commercial Fishermen's Association. Dredge at times of lower water temperatures to minimize impacts on fish. Consider the effects of pollutant uptake on sportfisheries. Since fish catches are increasing and dumping risks impacting fishery resources, alternatives to open water disposal should be sought. The waters are needed for food. Open water disposal should stop.

Health Effects

Establish a monitoring plan for bioaccumulation. Evaluate the potential for long term health effects from open water disposal. Develop contingency plans in the event of contamination resulting in a public health hazard.

Long Island Sound

The North Shore of Long Island has not been given sufficient weight in past decisions to allow open water disposal in the sound. Western Long Island Sound is most fragile. There is a 3 knot tidal current off Eaton's neck (1 knot at slack water). Long Island Sound is a unique ecological area. Opposition was expressed to regional dump sites within Long Island Sound because of impacts to fisheries and recreation; state of the art is lacking regarding monitoring and controls; uncertainty of stability of capping technique; effects of heavy metals; and effects on public health and welfare.

Develop a plan for terminating all disposal in Long Island Sound until assurances of no significant impacts are available. Use the EPA Ocean Dumping Criteria within the sound. Review western Long Island Sound data in Stone and Webster December 1971 report and proposed studies by Adelphi University. Model the sound dynamically, prior to establishing any long range dumping plan, considering physical oceanography, past and present dumping, and ecological sensitivity. Answer past technical questions regarding environmental effects of disposal and why disposal has been allowed when metals content in dredged material exceeds permissible limits. End all dumping in Long Island Sound since long term effects are unknown.

Management Plan

Detailed studies should be performed prior to open water disposal. Develop a site allocation scheme for clean vs. toxic material. Develop suitability criteria for dredge sediments and disposal sites. The management plan should include provisions for monitoring, including monitoring for effects of bioaccumulation; safeguards and controls. It should discuss jurisdictional requirements including Section 103 of the Ocean Dumping Act and Section 404 of the Clean Water Act.

Evaluate "short dumps" relative to long transport routes increasing their likelihood; resulting health hazards; and use of automatic location recorders to pinpoint their locations.

Testing should precede dumping. Consider treatment of dredged material before dumping; don't dump polluted materials. A long range monitoring plan is needed.

Mining of Sand

Resultant holes provide sites with minimum capping requirements but disposal there would preclude future mining.

Navigation

Disposal piles are obstructions to dragging.

Oysters

Consider the critical nature of estuaries and surrounding tidal marshes to oyster productivity. Evaluate the effects of heavy metals uptake, including silver, on oyster larvae. Identify extent and evaluate relative productivity of Norwalk Harbor oyster beds.

Recreational Boating

Consider the economic need for disposal sites close to the dredging sites. Discuss the reopening of historic disposal sites for certain materials.

Shellfish Contamination

Identify significant species, habitat, and behavior. Evaluate uptake of pollutants including metals, pesticides, herbicides, PCB's, coliform bacteria, hydrocarbons, and pathogens not picked up by coliform counts. Consider FDA action levels, filter feeders, and uncooked species as subjects of concern. Consider resource uses and effects on the food chain including human health effects. Discuss sanitary controls, agency responsibilities, presently closed areas (acreage presently unavailable for resource use) conditions for reopening, monitoring, enforcement, and conditions for future closings. Consider deep water dumping in 300' depths.

Site Selection

Consider distribution of sites, regional sites independent of specific projects. Evaluate site capacity, uses by material type, and expected needs. Consider in-water productive uses for dredged material such as sand overlay on muddy sites for oysters. Leave undisturbed mounds for lobsters. Discuss the formal EPA site "designation" procedure.

Studies by Others

Coordinate with other studies such as EPA, EIS on offshore disposal sites, Corps New England Division containment study and Disposal Area Monitoring System (DAMOS), Corps New York District Mitre Study on land alternatives, New England River Basins Commission proposed study of land alternatives, TerEco procedural guide for assessing designated EPA ocean disposal sites and Stone and Webster report on discharge modification for Long Island Lighting Company.

Water Quality

Define water quality in terms of State Standards, uses, classification, long term trends, and baseline data. For public understanding, define what is meant by water quality, how is it monitored, by whom, when is there concern for contamination, and what safeguards are available. Nassau County quality is presently improving after past deterioration. Evaluate western Long Island Sound shellfish beds.

PART B

OTHER ISSUES - Treated elsewhere or not significant

Alternatives	Oysters
Cost-Benefit Analysis	Regulatory Responsibilities
Cumulative Effects	Surface Runoff into Long Island Sound
Massachusetts Waters	Testing
Mosquito Control	Water Supplies

Alternatives to Open Water Disposal should be detailed in CEIS.

The Composite Environmental Impact Statement is one part of a broader continuing effort to develop a Management Plan for disposal of dredged material. The statement will assess the effects of open water disposal on a comprehensive regional basis and identify the least environmentally sensitive disposal sites. The "tiering" concept described in the Council on Environmental Quality regionations allows a broad generic treatment of alternatives. Subsequent studies, assessments, and impact statements detailing alternatives such as land disposal, shoreline extensions, marsh and island creation, and containerization will be available to the decision makers.

It is important to understand that the CEIS will not mandate open water disposal. Normal local, state, and federal regulatory processes will continue to be the route for obtaining the necessary authorizations. The CEIS will be but one more aid available to the decision makers.

Alternatives to open water disposal must be studied and assessed in comparable detail. Such alternatives are chiefly state coastal zone management concerns. The Corps has recommended to the New England River Basins Commission that they serve as a focal point for the states in development of a further EIS to assess these alternatives.

Cost-Benefit analyses on Corps' projects

This is a subject for treatment when assessing a specific Corps of Engineers' dredging project. The CEIS is not project specific.

Cumulative Effects should be quantified with regard to toxins, health impacts. The state of the art, including test data, is severely lacking in this regard. The CEIS will necessarily be limited to a discussion of available information and recommendations for future monitoring.

Massachusetts Waters should be included in the Study Area.

The study area was chosen as a manageable ecosystem for EIS development. A separate EIS is planned for Massachusetts and other Rhode Island waters.

Mosquito Control from increased breeding areas should be addressed.

This would relate to nearshore marsh creation and land disposal and not to open water disposal being addressed in the CEIS.

Oysters - Estuaries and surrounding tidal marshes are critical; cumulative wetland filling reduces this critical habitat.

These are subjects related to alternatives to open water disposal and as such would be treated in a very general sense in the EIS except to the extent open water disposal would impact estuaries and their marshes.

Regulatory responsibilities - Expand decision making criteria to reduce subjectivity

Regulatory responsibilities will be discussed briefly in the CEIS. It is anticipated that with development of the CEIS and the Management Plan that subjectivity will be reduced in the future.

Burden for disposal should be with community benefiting from dredging.

This is an issue to be considered by regulatory agencies in reaching their permit decisions. It cannot be answered in an EIS.

Surface runoff should be collected in basins and not allowed to enter Long Island Sound

To the extent that such runoff contributes contaminants to dredged material this subject will be addressed. However, the control of such sources of runoff are subject to local, State, and Federal regulatory agencies and applicable water quality standards.

Testing - Discussion of bioassay procedures; critique of bioassay procedures manual

Some discussion of this subject will be included, but a detailed critique of the manual is a national policy issue, not a regional EIS issue.

Water Supplies - aquifer contamination

This relates to land disposal alternatives and will not be detailed in the CEIS.

FDA - PHS SHELLFISH

WI
WI

Pollutant uptake

Commercially valuable species

Sanitary control
public health concerns
receiving waters

State/Federal responsibilities

Presently closed areas

Consider

1. deposit in least damaging areas

2. deep water dumping ~ 300'

Concern: filter feeders

uncooked species

toxic metals

mercury (action level)

pesticides

herbicides

EPA

PROCESS CLARIFICATION ^{W2}

EPA-EIS OFFSHORE

DISPOSAL SITES

Portland Me

COORDINATION W/ CORPS
EFFORT?

INPUT FROM OTHER STUDIES
DAMOS etc

DISCUSS WHERE ALTERNATIVES
TO OPEN WATER DISPOSAL COME IN
Land alt obj. to
Industrial sites

MACEM

Clarification of data

Collection techniques

Tie-in w specific dredging proj.
Containment Study etc

Cost benefit analysis on ^{W3} W3
CORPS PROJECTS

MASS WATERS - separate study?

TERECO - PROCEDURE TO (WES)
DESIGNATE SITES
USED IN CEIS?

ADEQUATE DATA BASE TO
ASSES SPECIFIC SITES

CT DEP

Analysis of existing
elutriate Sediment data how
bsa bioassay " reliable
procedures
Suitability

Contractor Critique of
bioassay manual

Study area boundary WA
103 - 404

jurisdictional reqmts

Eastern boundary
justification

eastern boundary

well used for fisheries

Why stop @ cont. shelf?

CONTINENTAL SLOPE

INTENSE ACTIVITY AREA

NMFS CONCERNS

Consider entire Slope

or limit to 100 fathoms?

economically feasible?

techn. feasible

Consider fisheries costs

NEAR SHORE VS OFFSHORE ENVIRONS
THEORY - comm-rec species

105
SEDIMENT CLASSIFICATION
TOXICITY

Allocation Scheme
clean vs toxic

Inventory - discharges
into surrounding waters

long term trends LIS W.Q.
available data? ~~data~~ data?

Define water quality
State Stds.
Use

FUNDING FOR ALTERNATIVES
bulkheads

DISPOSAL PILES - OBSTACLE
DRAGGING

All areas good for fishing

How many sites need for
expected needs + where?

Need distribution of sites - regional sites
independent of specific projects

Oyster - overlay sand on
muddy sites

lobsters - leave undisturbed
mounds

Consider in-water
productive uses

Identify suitable sites
Capacity

uses - marl types

INFO NEEDED TO "DESIGNATE"

SITES SHOULD BE PROVIDED
IN CES

CEIS & MGT PLAN W7

OPEN WATER DISPOSAL

CONTAINERIZATION - ALT
CORPS

ALTERNATIVES - LAND

NERBC EFFORT

FISHERIES

LOBSTERS

NORWALK PRESENTLY
PRODUCTIVE

IDENTIFY AREAS DRAGGED
AND BARREN AREAS

CT. COMM FISHERMEN'S ASSOC

CONTAINMENT AREAS ADJ
TO DREDGE AREAS

FISHERIES IN GENERAL LIS
CONTROLS ON DUMPING

RECREATIONAL BOATING

ECONOMIC NEED FOR
CLOSE DUMP SITES

(CLINTON)

REOPEN HISTORIC SOUND SITES
FOR CERTAIN MAT'L'S

ECONOMIC IMPACTS - MAJOR ISSUE

LAND ALTERNATIVES

CONSIDER WETLANDS

available wetland acreage
vs that needed for
sound estuary

HAMMONSET STATE PARK

BALANCE BETWEEN BOATING AND FISHERIES (CT CAM)

RELATE OUTER BOUNDARY OF STUDY AREA TO ECONOMICS FOCUS ON LONG IS. SOUND

DEPT HEALTH SERVICES

SHELLFISH - coliform toxic metals hydrocarbons

MOSQUITO CONTROL - increased breeding areas

WATER SUPPLY - aquifer contamination

Other pathogens not picked up
by coliform counts

SHELLFISH

MONITORING

TIMES OF DEPOSITS

LAND ALTERNATIVES

EFFECTS ON WATER SUPPLIES

Contaminant travel
times/routes

DREDGING SHOULD BE AT TIMES
OF LOWER WATER TEMPS.
FOR MIN FISH. IMPACTS

WETLAND FILLING

REDUCES SPAWNING CAPABILITIES

HISTORIC CT. LOSS OF WETLANDS

DREDGE MATERIAL TYPES

SUITABILITY CRITERIA

EXPAND DECISION MAKING

TO REDUCE SUBJECTIVITY

ALTERNATIVES TO OPEN WATER DISPOSAL

CONSIDER ALL POSSIBILITIES

COST BENEFIT

LONG TERM IMPACTS
(APR 77 REPORT)

SETTLEMENT AGREEMENT
AND NEPA NOT SATISFIED
BY LIMITING CEIS TO OPEN
WATER.

FIRM SCHEDULE?
31 DEC 79?

LONG ISLAND SOUND - UNIQUE
ECOLOGICAL AREA

SPOILS/SITES CRITERIA

OYSTERS

ESTUARIES & SURROUNDING
TIDAL MARSHES CRITICAL
CUMULATIVE IMPACT OF
WETLAND FILLING

CONTROL OF DUMPING

CONTAINERIZATION
FINES UNSTABLE

OYSTER LARVAE
HEAVY METAL UPTAKE
SILVER SENSITIVITY

"SHORT DUMPS" RELATIVE TO
LONG TRANSPORT ROUTES
& RESULTANT HEALTH HAZARDS (AUTO. LOCATION
RECORDERS)
CAPPING ALTERNATIVE
WHERE WILL CAPPING MAT'L
COME FROM?

CONTAINMENT AREAS
COAST GUARD-AIDS TO NAVIGATION

MINING OF SAND
RESULTANT HOLES
SITES W/ MIN CAPPING REQ'D

MAPPING/CLASSIFICATION OF
SEDIMENTS

EXISTING DATA

CONSIDER AUTHORIZED
VS NEEDED CHANNEL DEPTHS

LONG TERM TRANSPORTATION/
HARBOR USE PLANNING
RELATIVE TO DREDGING NEEDS

SITE SELECTION PROCESS
LABEL FOR OPEN WATER SITES

H1

OPPOSED TO REGIONAL
DUMP SITES W/IN LI SOUND
FISHERIES - RECREATION

MONITORING/CONTROLS
STATE-OF-ART LACKING
HEAVY METALS

STABILITY OF CAPPING

PLAN FOR TERMINATION OF ALL
LI SOUND DUMPING SHOULD BE DEVELOPED
PUBL. HEALTH/WELFARE

USE OCEAN DUMPING CRITERIA IN SOUND

LANDFILL & MARSH CREATION ALTERNATIVES

HALT DUMPING OPERATIONS TILL
ASSURANCES AVAILABLE

SHORT DUMPS

COST BENEFIT - ALL COSTS - NOT JUST
FISHERIES ECONOMIC

EMPLOYMENT - ON & OFF SHORE
QUANTIFY CUMULATIVE EFFECTS
TOXINS
HEALTH IMPACTS
MODEL SOUND - DYNAMICALLY/
PHYSICAL OCEANOGRAPHY
PAST/PRESENT DUMPING
ECOLOGICAL SENSITIVITY
PRIOR TO LONG-RANGE DUMP PLAN
SPOIL EROSION - LONG TERM EFFECTS
CONSIDER ENTIRE WATER COLUMN
LAND ALTERNATIVES
DISPOSE IN COMMUNITIES DREDGING
L IS DUMPING!
PAST TECHNICAL QUESTIONS SHOULD BE ANSWERED
METALS EXCEED LIMITS
ENVIRONMENTAL EFFECT
ALTERNATIVES NEED DEVELOPMENT FIRST
SPORTFISHERIES
POLLUTANT UPTAKE
CAPPING - EXPERIMENTS?
MONITORING
ENFORCEMENT
CONTROLS

END ALL LI SOUND DUMPING

LONG TERM EFFECTS UNKNOWN
CAPPING UNPROVEN

OCEAN + LAND ALTERNATIVES

ECONOMIC IMPACT TO BOATING W/OUT
LI SOUND DISPOSAL

ALT- INCINERATION w/ REMOVAL OF TOXINS

LOBSTERS- IMPACT @ EXISTING DUMP SITES

DISPOSE OF CLEAN SAND ~~FOR~~ DOWNDRIFT
BEACHES

NORTH SHORE L.I. NOT GIVEN SUFFICIENT
WEIGHT

STOP SILTATION + POLLUTION @ SOURCE

CONSIDER ALTERNATIVES TO OPEN WATER DUMPING
WATERS NEEDED FOR FOOD

FISH- CATCH INCREASING
DUMPING RISKS IMPACTING
RESOURCES

LAND ALTERNATIVES
IN VICINITY OF DREDGE SITE
IMPACT ON WATER SUPPLIES
TESTING SHOULD PRECEDE DUMPING
WESTERN L.I. SOUND DATA
(STONE & WEBSTER DEC 71 REV JAN 72)
WESTERLY NET TIDAL FLOW
NO FLUSHING
ADELPHI UNIV STUDY PROPOSED
DREDGING NEEDS-NORWALK
ABATEMENT COMMITTEE
NORWALK HBR-OYSTER BEDS
BALANCE ALL CONCERNS
TREAT MATERIAL BEFORE DUMPING
NO DUMPING OF POLLUTED MATERIALS
RECEIVING WATERS BECOME
POLLUTED

#5
OIL SPILL RISKS W/ INADEQUATE
DEPTHS

ALT. - INCREASED TRUCKING
OPEN OCEAN DUMPING ALTERNATIVE

NASSAU COUNTY WATER QUALITY
PAST DETERIORATION
PRESENTLY IMPROVING

DISPOSAL IN WESTERN LIS
ESPECIALLY IN VICINITY
OF SHELLFISH BEDS

INORGANIC-ORGANICS

WESTERN LIS MOST FRAGILE

DETAIL STUDIES REQ'D BEFOREHAND

LONG RANGE MONITORING

LAND ALTERNATIVES - EVALUATE WATER
SUPPLY CONTAMINATION

H6

3 KNOT TIDE OFF EATONS NECK
1 KNOT @ SLACK WATER

MONITORING PLAN
BIOACCUMULATION

EVALUATE POTENTIAL FOR LONG TERM
HEALTH EFFECTS.

CONTINGENCY PLANS IN EVENT
OF CONTAMINATION/PUBLIC
HEALTH HAZARD

HUNTINGTON - LAND SITES AVAILABLE

ATTACHMENT 7



DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION, CORPS OF ENGINEERS
424 TRAPELO ROAD
WALTHAM, MASSACHUSETTS 02154

REPLY TO
ATTENTION OF:
NEDOD

STATUS REPORT

COMPOSITE ENVIRONMENTAL IMPACT STATEMENT

MANAGEMENT OF DISPOSAL OF DREDGED MATERIAL

FROM THE LONG ISLAND SOUND AREA

This report is intended to provide an update on the progress of the referenced environmental impact statement. It includes an outline of the scope of the statement, a brief description of sites selected for further study for the open water disposal alternative, and a request for any comments you may wish to make at this time.

In June, we mailed a summary of the Public Scoping Meetings. The comments we received were valuable in helping to define the scope of the EIS. Attached is an outline of that scope indicating, in particular, that all feasible alternative methods of disposal will be treated. Alternatives such as land disposal, however, will necessarily be treated in a more generic manner than open water disposal. This is due to the state of the art of disposal options, available scientific data, and land use and coastal zone issues being under the jurisdiction of State and local governments. For the latter reason, we requested that the New England River Basins Commission perform detailed studies of shoreward alternatives. To that end the Commission submitted a study proposal to the Water Resources Council for FY 81 funding. We proposed to provide funds to the Commission in FY 80 for preliminary work of a generic nature that would be of use in the CEIS as well as in the subsequent detailed studies. We are presently defining those tasks that would be Corps funded. We intend to present the various options in a format which will allow ready comparisons for project specific decision making.

Also attached is a map which shows the environmental suitability of the study area and which indicates the sites chosen for detailed impact analysis.

This map was prepared by our contractor, Dames & Moore, who considered specific characteristics, weighed and combined them into broader issues of considerable significance and mapped them over the study area. These maps, in turn, were used as issues and, via controlled debate and decision iterations (Delphi) by a select group of academic, Corps, and Dames & Moore representatives, were assigned relative importance values, as listed below, and combined to form the inclosed map.

<u>Issue</u>	<u>Importance (%)</u>
Ecological Sensitivity	25
Fisheries Sensitivity	22
Potential for Spreading of Deposited Materials	17
Monitoring and Surveillance	13
Water Quality	12
Non-Living Resources	5.5
Coastal Area Sensitivity	5

This suitability map makes use of computer symbols to delineate areas of different classes of suitability as shown on the map legend. These values are relative and should be considered with that perspective. For purposes of comparison, each category may be considered to be eleven percent more suitable than the next lower category.

The refinement of the broader areas of high suitability class to more detailed areas, as outlined below, was developed by Dames & Moore with regard to considerations presented by the Dredging Management Work Group of the New England River Basins Commission at their 7 August meeting. Present at that meeting were representatives from the Environmental Protection Agency, the Coast Guard, the Corps of Engineers, the National Marine Fisheries Service, the Fish and Wildlife Service, the Food and Drug Administration, the CT/NY/NJ Interstate Sanitation Commission, The Connecticut Department of Environmental Protection, the New York State Department of Environmental Conservation and the State of Rhode Island. Primary concerns of this group were the need for regional sites throughout Long Island Sound and that priority be given to existing sites where feasible. The site areas to be studied in detail were selected based on regional considerations and location of sources of dredged material as well as environmental suitability.

Areas of 'high plus' suitability (the most suitable areas) occur in a broad area of the outer continental shelf and in central Long Island Sound from the offshore vicinity of New Haven to Stony Creek. In view of the availability of areas within Long Island Sound with high suitability comparable to the outer shelf areas, and the significant economic impacts associated with the use of such distant sites, the shelf site areas were not recommended for detailed evaluation.

Site Area A is centered around a small area of 'high' suitability, located off the Bridgeport Harbor. It represents the most environmentally suitable area in western Long Island Sound, and includes portions of the old Bridgeport site. Major dredge sources in this area include the Housatonic River projects and Bridgeport Harbor.

Site Area B is located predominately in the central Sound 'high plus' area and includes the abandoned Branford disposal site. This area is the most suitable area in the central Long Island Sound region.

Site Area C is centered in an area of 'high' suitability offshore from Clinton Harbor and within reasonable distance of the Connecticut River sources of dredged materials.

Site Area D is located in Block Island Sound centered on a 'high minus' suitability area at the Connecticut-Rhode Island border (Pawcatuck River). This area is the most suitable area in the eastern Long Island Sound/Block Island Sound region.

In response to the Dredging Management Work Group suggestion for inclusion of a site area for impact assessment from within Western Long Island Sound in the Norwalk to Stamford region, Site Area E was selected. This area represents the most suitable area within the broad 'intermediate plus' area of suitability which characterizes the Western Sound and includes a portion of the abandoned Eaton's Neck Disposal Site.

In addition to the above sites, the present New London and New Haven Disposal Sites, F and G, will be included for impact evaluation to provide a comparison between existing sites and those identified through the suitability analysis.

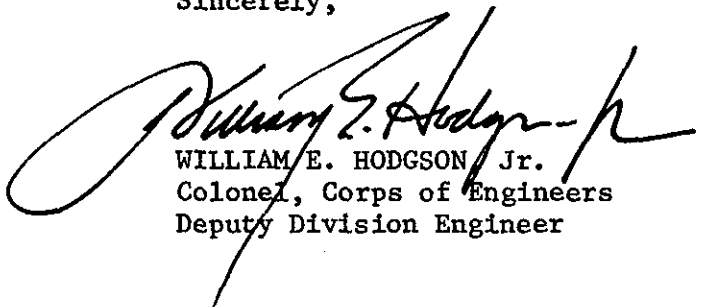
The areas described above are sites recommended for further study and should not be thought of, at this time, as designated sites for the disposal of dredged material.

We invite your comments on the scope of the EIS and on the site areas to be studied further. Detailed comments with respect to the characteristics, uses, and potential impacts at the specific areas selected for further study are particularly invited.

Comments should be mailed to:

U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02154
ATTN: Mr. William F. Lawless
Project Manager
Operations Division

Sincerely,



WILLIAM E. HODGSON, Jr.
Colonel, Corps of Engineers
Deputy Division Engineer

OUTLINE AND PRELIMINARY SCOPE FOR

COMPOSITE

ENVIRONMENTAL IMPACT STATEMENT

FOR MANAGEMENT OF

DISPOSAL OF DREDGED MATERIAL

FROM THE

LONG ISLAND SOUND AREA

U.S. ARMY CORPS OF ENGINEERS
NEW ENGLAND DIVISION

SUMMARY

INTRODUCTION

A. Definition of Study Area -

Long Island Sound (LIS) and Block Island Sound (BIS) and contiguous environs; Describe, show map with significant landmarks as related to dredging: dredging sites, amounts, old and present disposal sites (aquatic and upland), etc.

B. Dredged Material Disposal - Past, Present, and Future -

Brief description of dredging methods and disposal alternatives. Describe past practices and amounts - present situation and proposed future plans.

C. Problems with Dredged Material Disposed from LIS -

Summarize significant environmental, social, economic, and engineering problems associated with dredged material disposal - Federal, State and Private perspectives.

D. Concerns and Issues -

Summarize significant concerns and issues; especially public reaction to dredging and disposal in LIS - provide table, relating groups and agencies to significant issues and show where controversy is apparent.

E. Need for and Purpose of Study and EIS -

Describe why this EIS, study and any proposed future studies are necessary; underlying purpose, court ruling, etc.

F. Major Conclusions and Findings -

Briefly summarize major conclusions of the EIS/study - explain how they will be utilized in the future; recommended strategies, National Economic Development (NED) versus Environmental Quality (EQ) accounting, etc.

LAWS AND REGULATIONS AFFECTING DREDGED MATERIAL
FROM THE LONG ISLAND SOUND AREA

- A. Short paragraph describing why, purpose, and usefulness of relevant environmental laws and policies affecting study and proposed plans.
- B. Table to show all relevant laws and regulations, with brief statement as to objections of law/reg, relevance to this study, how considered, and reference. Laws and regulations covered should include, but not be limited to Federal: NEPA; CWA, Section 404 & 401; Clean Air Act; Coastal Zone Management Act; Deepwater Port Act; Endangered Species Act; Federal Water Project Recreation Act; Fish and Wildlife Coordinate Act; Historic Sites Act; Marine Protection, Research and Sanctuaries Act; National Historic Preservation Act; River and Harbor Act, etc.; and State and Local Regulations: Coastal Zone Management Programs; Land Use Plans; Water Quality Certification, etc.
- C. Those laws and regulations determined as significantly relevant will be described and related to program in more detail.

AFFECTED ENVIRONMENT

- A. General setting: show boundary of study area, general geographic condition, i.e. bathymetry, cities and rivers on map and provide discussion of economics, demography and ecology of LIS, BIS, and coastal environs.
- B. Significant Resources: discuss significant resources of area; fisheries (habit, fishing and spawning grounds) recreation, etc. (perhaps show derived or issue maps from Dames & Moore).
- C. Description of Dredged Material: show (in tables) past and predicted amounts and quality of dredged material from LIS area, attempt to categorize for alternative disposal methods.
- D. Description of proposed disposal sites - detailed environmental conditions at proposed disposal sites where possible, i.e. perhaps show some maps from Dames & Moore.

ENVIRONMENTAL EFFECTS

- A. Introduction of significant effects - each will be subheading for more detailed discussion.
- B. Social-Economic Effects - preliminary indication would fall in following categories: Demography, economics, transportation/navigation, aesthetics, cultural resources, recreation.
- C. Natural Resources - Physical resources, including water quality, substrate characteristics, etc; and biological characteristics including shellfish, finfish, valuable or sensitive species, etc.

ALTERNATIVES

- A. Introduction of all potential alternatives* - make table briefly showing pros and cons of each within social, economic, environmental, etc. categories; include no-action alternatives.
- B. Describe which alternatives are proposed and why; which ones are not considered feasible, and which ones are feasible under conditions. Provide table (matrix) to interrelate circumstances within each preferred alternative. Provide a short discussion of social, economic, environmental, and engineering considerations, mitigation, surveillance and monitoring, etc.
- C. Describe how proposed alternative should be selected: NED versus EQ rational for decision, i.e. balance economic efficiency with environmental considerations.

*Alternative studied should include, but not be limited to the following: No action, no dredging, limited dredging, deep ocean disposal, offshore island containment, dispersal, continued open water disposal, upland disposal, river/harbor disposal, wetland creation, constructive uses, decontamination, beach nourishment, etc.

PUBLIC PARTICIPATION

- A. Describe public participation process, i.e. scoping, Delphi, NERBC work group, etc.
- B. Describe issues located during public participation process, use table to show relationship to various categories of issues and where controversy occurs.
- C. Describe steps taken to resolve significant or controversial issues.
- D. Describe mailing list and list of cooperating agencies or groups.

LIST OF PREPARERS

APPENDICES

ATTACHMENT 8

RICHARD L. OTTINGER
24TH DISTRICT, NEW YORK

COMMITTEES:
ENERGY AND COMMERCE
SCIENCE AND TECHNOLOGY

Congress of the United States
House of Representatives
Washington, D.C. 20515

July 14, 1981

REPLY, IF ANY TO:

- ☐ 2241 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
(202) 225-6506
- DISTRICT OFFICES:
- ☐ 77 QUAKER RIDGE ROAD
NEW ROCHELLE, NEW YORK 10804
(914) 235-5600
- ☐ 100 STEVENS AVENUE
SUITE 202
MOUNT VERNON, NEW YORK 10550
(914) 699-2866

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts 02254

Dear Mr. Tomey:

I am writing to submit my comments on the Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region.

I represent the 24th Congressional District of New York which encompasses the Westchester County Long Island Sound shore communities. The economic well-being of these communities depends upon keeping the harbors open and vital. The costs of maintenance dredging have skyrocketed in recent years due to the inavailability of accessible dumping sites. Upland disposal sites in Westchester do not exist and the prohibitive costs of dumping in the ocean together with the incompatibility of ocean-going equipment with the type of work which must be performed in these harbors, makes this remaining type of disposal difficult and exorbitantly expensive, at best.

It is the purpose of this letter to advise you of my support of the comments which you have received from a number of my constituents urging the Corps to study and open environmentally acceptable dumping sites in the western portion of the Sound. In order to accomplish this end, it has been suggested that the eastern portion of Eaton's Neck be reopened immediately and that the Corps evaluate additional dumping sites in the western New York State Long Island Sound waters. Such sites might include the Stamford-Norwalk-Eaton's Neck triangle, Eaton's Neck West, and Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island. I formally request that your ongoing DAMOS (Disposal Area Monitoring System) study include these and other appropriate disposal areas located in the western portions of the Sound. Further it is my hope that the New England Division will coordinate its efforts with the New York District Corps which has direct jurisdiction over the Westchester communities

Finally, I urge the Corps to move as expeditiously as is possible to establish the western Sound disposal areas. I am hopeful that the years of examination of this issue have yielded sufficient amounts of environmental and other critical evidence to preclude further lengthy and time-consuming hearings. If additional hearings are required, I request that they be held in Westchester.

FCI

Mr. David Tomey
July 14, 1981
Page Two

Many thanks for your attention to my concerns on this critical issue. The health of the economy of the Westchester Sound shore communities depends to a large extent on the health of the harbors. Therefore it is critical that an environmentally harmless and economically feasible dumping site in the western portion of the Sound be established.

Sincerely,

A handwritten signature in cursive script that reads "Richard L. Ottinger". The signature is fluid and written in dark ink.

Richard L. Ottinger
Member of Congress

RLO:mko



F1

JUN 16 1981

Department of Energy
Chicago Operations Office
Office of Regional Activities - Boston
150 Causeway Street
Boston, MA 02114

The Division Engineer
New England Division
Attn: David Tomey, NEDPL-JP
US Army Corp of Engineers
424 Trapelo Road
Waltham, MA 02154

Dear Mr. Tomey:

We have reviewed the Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in Long Island Sound.

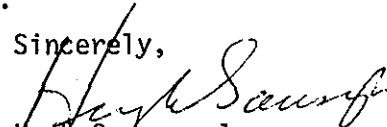
Dredging the waterways of New England is an important subject which is of great concern to the Department of Energy. These waterways are the primary routes by which many fossil fuels enter New England. If these ports and harbors are not maintained at their maximum capacity, then the New England energy picture is severely damaged. As stated on Page III-1, distribution efficiency is maintained by maximizing the size of the vessels (deep draft) making the deliveries. The conversion of power generating plants to coal at the Norwalk and Bridgeport facilities will increase the use of these harbor facilities. This also could be compounded by the possible accidental discharging of coal in the shipping lanes and berthing sites, requiring increased dredge maintenance schedules.

Therefore, if the locations for the disposal of these dredged materials is not solved soon, many delays will continue to be created in the maintenance schedules of these waterways of Long Island Sound. DOE, as well as many other state and federal agencies have been working under the NERBC to solve these critical disposal questions.

We continue to support these efforts and feel that this programmatic EIS is a step in evaluating all the alternatives available to solve a possible impasse. We realize that dredge disposal has large environmental effects upon areas where they are deposited. However, decisions must be made which may not be completely satisfactory to everyone's point of view. We must advance slowly but steadily in order not to seriously damage either the economic or environmental conditions of New England.

Thank you for this opportunity to comment.

Sincerely,


Hugh Saussy, Jr.

Director
Office of Regional Activities-Boston



REGION I

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
HARTFORD AREA OFFICE
ONE FINANCIAL PLAZA
HARTFORD, CONNECTICUT 06103

June 24, 1981

IN REPLY REFER TO:

1.2SS (Forzley)

Division Engineer
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, MA 02254

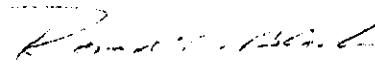
Dear Sir:

Subject: Draft-Programmatic EIS
Disposal of Dredged Material
Long Island Sound

We have reviewed the above statement and commend the Corps for providing an information base for future site-specific proposals dealing with disposal of dredged materials in the Connecticut environs. As these proposals are received, we will review them as to their impact on HUD assisted activities.

Thank you for the opportunity to comment on this programmatic EIS.

Sincerely,


John W. McLean
Area Manager

cc: David Prescott, Region I, ECO



United States Department of the Interior

OFFICE OF THE SECRETARY

Office of Environmental Project Review
15 State Street
Boston, Massachusetts 02109

In Reply Refer To:
ER 81/1082

July 2, 1981

Colonel C. Ernest Edgar, III
Division Engineer
New England Division, Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Dear Colonel Edgar:

We have reviewed the draft programmatic environmental impact statement for the disposal of dredged material in the Long Island Sound Region.

Fish and Wildlife Resources

Our concerns center primarily on the potential long-term cumulative impacts of open water disposal on the aquatic ecosystem. The documents do not critically review the alternatives to open water disposal but instead promote the expansion of the three existing disposal sites to the possibility of seven open water disposal sites. The Corps appears to be treating all classes of dredged material as waste with no indepth analysis of the use uncontaminated dredged material as a beneficial resource.

We prefer the beneficial use of uncontaminated dredged material, such as habitat development, beach restoration, land reclamation, or building aggregate. For contaminated material, we recommend upland and/or aquatic containment. Although aquatic containment is the subject of a separate Corps study, there is no analytical investigation of upland containment in the region.

As acknowledged in the reports, the potential long-term impacts of open water disposal of contaminated dredged material on the aquatic ecosystem are not well understood. The discussion of these long-term impacts is centered on heavy metals, chlorinated hydrocarbons, and oil and grease. These substances are only a small subgroup of the 129 compounds that have been listed by the Environmental Protection Agency as toxic substances. We recommend that these priority pollutants be investigated in any disposal of contaminated material.

The subject of long-term impacts is being studied by the Corps' DAMOS program at the three interim sites in Long Island Sound. Since these impacts

-2-

are not fully understood and the efficacy of capping as a mitigative measure has not been established, we recommend against the expansion of disposal sites in Long Island Sound.

Mineral Resources

From the information provided in Appendix A, Environmental Impact Report, it is difficult to assess the project impacts on mineral resources. Mineral resources are listed as a study criteria in the Open Water Disposal Study Data Structure Diagram, but in section II. B-3, Rating of the Issues, were considered of low importance. We contend that, environmental and technical problems notwithstanding, offshore sand/gravel deposits exist in the LIS and that the disposal of dredged sediments may preclude specific sites from future development. Rapid depletion of land sources of these materials in the LIS region justifies serious consideration of recovering abundant near shore deposits.

We suggest that the report address more directly the conflict of disposal sites and potential resources. Specifically, mineral resources should be included in Table III. B-1 in the Site Use Value Considerations. Further, a statement should be included in each of the Physical Characteristics sections for the seven proposed sites that would provide an indication of the relative marketability of the sediments present, based on available data such as particle size distribution and clay content.

We recommend inclusion of measures such as sediment curtains to control the migration of resuspended fine-grained sediments during dredging and open-water disposal operations (pg. V-13).

Concluding Comments

We consider this programmatic statement to be inadequate in regards to the long-term impacts of open water disposal and the alternatives to open water disposal. These inadequacies will remain until the questions on long-term impacts are answered and the attitude that dredge material is a waste product prevails.

Sincerely yours,



William P. Patterson
Regional Environmental Officer

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UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
NORTHEASTERN AREA STATE AND PRIVATE FORESTRY
370 REED ROAD -- BROOMALL, PA. 19008

1950
July 21, 1981



Colonel C. E. Edgar, III, Division Engineer
New England Division
U. S. Army Corps of Engineers
424 Trapelo Road
Waltham, MA 02254

Attention: Mr. David Tomey, NEDPL-IP

Dear Colonel Edgar:

After review of the Draft PEIS for the Disposal of Dredged Material in the Long Island Sound Region, the following comments are submitted for your consideration in preparing the final document.

As this document is now written, it is difficult to determine what, if any, decision is being made on the disposal of dredged material. Since this is a programmatic statement, we would look for the document to set out overall program direction. In Section IV, Alternative Methods of Dredged Material Disposal, there should be an indication of which one or more alternatives is (are) preferred. This would effectively reject the "no action" alternative and establish the feasible methods of disposal.

Criteria and methodology should be developed for evaluating which disposal method should be used when site-specific projects are analyzed. On page ii there is mention of the development of consideration tables, but no discussion of this subject is contained in the body of the document. If this is proposed as an evaluation method, then more explanation is needed on the considerations to be used in rating alternatives.

In Section V, The Affected Environment, a general description of upland sites and wetlands should be added to adequately describe all areas where dredged material could be disposed.

We appreciate the opportunity to review this document and hope our comments will prove helpful.

Sincerely,

for ALLEN J. SCHACHT
Area Director



F5

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Services Division
Habitat Protection Branch
7 Pleasant Street
Gloucester, MA 01930

July 22, 1981

Col. C. E. Edgar, III
Division Engineer
New England Division
Corps of Engineers
424 Trapelo Road
Waltham, MA 02254

Dear Colonel Edgar:

The National Marine Fisheries Service (NMFS) has reviewed the Draft Environmental Impact Statement -- Disposal of Dredged Material in the Long Island Sound Region.

In order to provide as timely a response to your request for comments as possible, we are submitting the enclosed comments to you directly, in parallel with their transmittal to the Department of Commerce for incorporation in the Departmental response. These comments represent the views of the NMFS. The formal, consolidated views of the Department should reach you shortly.

Sincerely,

Ruth Rehfus
Acting Branch Chief

Enclosure





PS
UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Services Division
Habitat Protection Branch
7 Pleasant Street
Gloucester, MA 01930

July 22, 1981

TO: PP/EC - Joyce M. Wood
FROM: *Ruth Rehfus*
F/NER54 - Ruth Rehfus

SUBJECT: Draft Environmental Impact Statement--Disposal of Dredged
Material in the Long Island Sound Region (CE) (DEIS 8105.31)

The Draft Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region that accompanied your memorandum of May 29, 1981, has been received by the National Marine Fisheries Service (NMFS) for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

General Comments

In our opinion the DEIS fails to address the problems associated with disposal of polluted material in Long Island Sound. It is our understanding that the problems this document was to address include:

1. The continued use of the New London site which has depths less than the desirable level of twenty meters and so could be subject to storm induced erosion.
2. Identification of an alternative site to the New London site.
3. The use of the Cornfield Shoals area allows dispersal of dredged material dumped there, yet the impact on the resources of Long Island Sound by such action has never been determined.
4. The mud cap covering the heavily polluted Stamford material at the New Haven dump has lost at least twelve percent of its volume while the sand structure remains stable. What has been done to recap the mud cover with sand or further stabilize this or any other disposal site with an entombment activity?
5. Capping as a disposal option for entombment of heavily polluted material is being developed as an implementable technique but the issues of insuring accurate placement and coverage on a routine basis continue to hamper broad acceptance of the technique. Can these problems be resolved and if so when?

CCE-Waltham



6. What are the ramifications of openwater disposal of material laden with man-made contaminants?

We find little in the present documents that deals with these managerial issues which we believe are central to the assessment of impacts related to the management of dredged material disposal in Long Island Sound.

Appendix B (Long Term Impacts of Open Water Disposal of Dredged Material) and Appendix C (Economic Analysis of Future Dredged Material Disposal in Long Island Sound) at Section V, begin to deal with these pivotal issues. However, the main body of the document lacks site specific determinations regarding the real and potential problems of using the specified dump sites.

Appendix A to the DEIS is thorough, but does not correspond well to the main document on several points. These include the impacts of use of Cornfield Shoals and the New London site, as well as the need for determining area sensitivity at all dump sites. None of these issues are addressed in the DEIS; however, that document refers to Appendix A which identifies the existence of these problems.

Appendix A is based on a contractor's data analysis that attempted to weigh relative values of the resources of Long Island Sound. NMFS staff members who attended some meetings during its development raised numerous questions about the basis for the evaluation. To date those questions have gone unaddressed.

The statement that the entire DEIS was closely coordinated with NMFS and other federal agencies is incorrect. Except for the limited coordination on Appendix A, opportunities for NMFS input to the DEIS were confined to attendance at two hearings.

In our opinion these factors seriously fault the document. To correct the problems, we believe it would be advisable to withdraw them from circulation and redraft the EIS, using the contents of Appendices B and C as the basis for addressing the disposal of dredged material in Long Island Sound.

CLEARANCE

SIGNATURE AND DATE:

F/HP:R.Smith



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

July 22, 1981

Colonel C. E. Edgar, III
Division Engineer
New England Division
U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, MA 02254

ATTN: Mr. David Toney
NEDPL-IP

RE: D-COE-B35010-00

Dear Colonel Edgar:

In accordance with Section 309 of the Clean Air Act, the National Environmental Policy Act, and Section 404 of the Clean Water Act we have completed our review of the Draft Programmatic Environmental Impact Statement (EIS) for the Disposal of Dredged Material in the Long Island Sound Region. This Draft EIS has been rated LO-1 in accordance with our national EIS rating criteria, a copy of which is enclosed.

The Draft Programmatic EIS provides very general information on the impacts of disposing "dredged materials" in Long Island Sound. While the EIS documents address the six viable disposal alternatives available (open water, upland, containment, beach restoration, incineration and resource reclamation) any recommendation for appropriate disposal is deferred until a site specific dredging project is proposed and evaluated on a case by case basis. At the time these specific projects are proposed, we will need to know the following information in order to evaluate the specific dredging and disposal proposal.

1. Need for disposal.
2. Amount of material to be dredged for private projects associated with Corps project or individually.
3. Ocean dumping and 404(b) evaluations.
4. Dollar figures in order to evaluate alternative methods on a case by case basis.

We point out the need for addressing the requirements of the Ocean Dumping Act as recent amendments to the Act require the extension of ocean dumping criteria to Long Island Sound for dredging projects in excess of 25,000 cubic yards. EPA is presently reviewing proposed changes in the ocean dumping regulations and anticipates the proposed regulations to be issued this fall.

We agree with the difficulty in identifying potential long-term impacts associated with open water disposal of dredged materials. Therefore, we will continue to work with the Corps on ways to assess disposal of dredged material in Long Island Sound.

Enclosed are additional specific comments for your use in preparing the Final EIS. If you have any questions relative to our comments, please contact Donald Cooke of my staff at 617/223-4635.

Sincerely,

Wallace E. Stickney

Wallace E. Stickney, P.E.
Director
Environmental Impact Office

Enclosures

70
E6

SPECIFIC COMMENTS

1. Page IV-8 - The EIS uses the creation of the Smith Point Park parking lot as a good example of the productive use of dredge spoil. This project is approximately 20 years old, destroyed productive barrier island habitat and is not on Long Island Sound. The Corps should try to come up with an example of dredge spoil use that is non-harmful, more up to date, and within the project area.
2. Page IV-13 - Mudflats are accretion areas and do not need "replenishment."
3. Page IV-15 - This discussion on the use of L.I.S. dredged spoil for agricultural enhancement should mention that the high salt content will make these spoils useless for this purpose.
4. Page VI-2, para. 2 - Please note that habitat alteration is not a short-term impact.
5. Page VI-7 - The discussion on solid phase bioassay on line 4 should read "Statistically significant mortality and greater than 10% of the control sediment."
6. Page VI-10, lines 2 and 3 should read "mostly insoluble." The heavy metals and organochlorides found in dredge spoil are not completely insoluble by any means.
7. Page VI-10, para. 2 - This paragraph uses the term "highly contaminated dredged material." The Corps should define the term "highly contaminated" in the EIS. Regardless of the definition, the intent of the Clean Water Act is to avoid the discharge of highly contaminated material into the aquatic environment.
8. Page VI-11, para. 1 - The East River should not have been singled out as the only river contributing to the pollution of L.I.S. There are industrial rivers in Connecticut which add to the high loads of pollution to the Sound.
9. Page VI-14, para. 2 - The Corps notes that it will use spawning areas for dumping on a seasonally restricted basis. If the spawning site is at all valuable ecologically and/or commercially, the area should not be used as a dump site.
10. Page VI-16, bottom para. - The Corps should define the term "high levels of contaminants" in the EIS. The Corps should explain how these spoils are "deemed" suitable for open-water disposal.
11. Page VI-17, bottom para. - The Corps should also define the term "high risk contaminated materials" which are to be dumped in open-water.

~~F-6~~
F-6

EXPLANATION OF EPA RATING

Environmental Impact of the Action

L0 -- Lack of Objections

EPA has no objections to the proposed action as described in the draft environmental impact statement; or suggests only minor changes in the proposed action.

ER -- Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating federal agency to reassess these aspects.

EU -- Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1 -- Adequate

The draft environmental impact statement sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2 -- Insufficient Information

EPA believes that the draft environmental impact statement does not contain sufficient information to assess fully, the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft environmental impact statement.

Category 3 -- Inadequate

EPA believes that the draft environmental impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft environmental impact statement is assigned a Category 3, no rating will be made of the project or action; since a basis does not generally exist on which to make such a determination.



DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD

Commander (dpl)
Third CG District
Governors Island, NY
(212) 668-7001 10004

•16475.2/11-79
23 July 1981

• Mr. David Tomey
U. S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, MA 02254

Re: Draft Programmatic EIS, Disposal of Dredged Material in the Long Island Sound Region

Dear Mr. Tomey:

We have reviewed the subject document and would like to offer the following comments.

1. Statements are made on pages III-1 and VI-51 that the use of deep draft vessels necessitates regular maintenance dredging; without this dredging, the risk of chemical/oil spills from both groundings and additional transfer of supplies (lightering) would increase. We strongly agree with these statements and appreciate your efforts in resolving the tremendously complex issue of dredge spoil disposal in this region.
2. The alternative method of Deep Ocean Disposal is discussed on page IV-3 et seq. Among the conclusions reached is that the cost of this option would be relatively high. To this we would like to add the significant amount of time and resources that we would be required (under the Marine Protection, Research and Sanctuaries Act) to expend on surveillance of deep ocean disposal operations. The use of the Coast Guard-developed Ocean Disposal Surveillance System (ODSS) would have provided a very effective, reliable substitute for surveillance currently performed by our vessels, helicopters and shipriders; unfortunately, an ODSS unit would cost \$10,000 if any company had been willing to manufacture it, which they were not. The Coast Guard subsequently withdrew proposed rules to require an ODSS on waste transporter operations. In short, existing disposal operations in the New York Bight are already straining our resources. We ask that this be included as a factor in choosing appropriate disposal sites.
3. In the discussion of the Incineration alternative (p. IV-14), it is stated that "inorganic contaminants, such as heavy metals, would not be eliminated by incineration although some inorganic compounds may be degraded by high temperatures." It may be worthwhile to investigate the use of pyrolysis in place of incineration because of the former's superior retention of toxic heavy metals in the solid phase.¹



It's a law we
can live with.

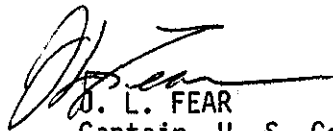
F-7

16475.2/11-79

4. Recognizing that this is a programmatic and not a site-specific EIS, we would like to see a discussion of potential impacts on navigational safety from dredge disposal in open waters, e.g. where the disposal sites are in relation to the main shipping channels in Long Island Sound and beyond, reduction in water depths from the creation of mounds, and additional vessel traffic from disposal operations. We would be glad to assist you in exploring these potential problems.

Thank you for the opportunity to comment on this document.

Sincerely yours,



J. L. FEAR
Captain, U. S. Coast Guard
Chief of Staff
Third Coast Guard District

References:

1. U. S. Environmental Protection Agency, Region II. Draft Environmental Impact Statement on the Hudson River PCB Reclamation Demonstration Project. May, 1981.



**DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD**

MAILING ADDRESS:
COMMANDER (ea)
FIRST COAST GUARD DISTRICT
150 CAUSEWAY STREET
BOSTON, MA 02114

Tel: (617) 223-7562
16475
27 July 1981

From: Commander, First Coast Guard District
To: Division Engineer, U.S. Army Corps of Engineers,
New England Division, 424 Trapelo Road, Waltham,
MA 02254, ATTN: Mr. David Tomey

Subj: Programmatic EIS for Disposal of Dredged Material

1. I have reviewed the Programmatic EIS for Disposal of Dredged Material in Long Island Sound Region.
2. I concur with the need to maintain adequate channel depth to allow passage of commercial and recreational vessels into developed harbors. The document provides a useful discussion of environmental issues and mitigating measures related to the disposal of dredge materials.
3. Proposed dredge site D is the only site which is within the First District boundaries. I note that this site is not being actively pursued as an alternative at this time. If this site is given further consideration, I request that the location be coordinated with CDR George F. IRELAND, Captain of the Port of Providence. The proposed site is currently approximately one (1) mile south of the busy shipping route connecting Long Island Sound with Buzzards Bay and the Cape Cod Canal. A greater separation between these activities is desirable as indicated by the previous Captain of the Port letter dated 24 Jan 80.
4. The Captain of the Port Providence may be reached at FTS 838-4435 or 401-528-4335. Mail may be addressed to:

Captain of the Port of Providence
John O. Pastore Federal Building
Providence, RI 02903
5. I may be contacted for further assistance at FTS - Commercial 223-7562.

P.V. KASELIS
By direction



59
UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SURVEY
Rockville, Md. 20852

JUN 22 1981

OA/C52x6:JVZ

TO: PP/EC - Joyce M. Wood
FROM: OA/C5 - Robert B. Rollins *RB Rollins*
SUBJECT: DEIS #8105.31 - Disposal of Dredged Materials in the Long Island Sound Region

The subject statement has been reviewed within the areas of the National Ocean Survey's (NOS) responsibility and expertise, and in terms of the impact of the proposed action on NOS activities and projects.

The circulation, tide and flushing materials are adequate for the purpose intended. The bibliography to which the text is referred, contains all the significant physical oceanographic literature. The geology and oceanography portions are particularly well done.



10TH ANNIVERSARY 1970-1980

National Oceanic and Atmospheric Administration

A young agency with a historic
tradition of service to the Nation



F9

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
OFFICE OF MARINE POLLUTION ASSESSMENT
Northeast Office
State University of New York
Stony Brook, New York 11794

DATE: June 29, 1981

TO : PP/EC - J. Wood

FROM: RD/MPF26 - J. O'Connor *Joel S. O'Connor*

SUBJ: EIR (Environmental Impact Report) on "Open
Water Disposal of Dredged Material on Long Island
Sound and Adjacent Waters"

Subject document, it should be noted, is an EIR. It is being used also as a Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region. This confusing matter is even more confused because the EIR is to "serve as part of the basic information for a Composite Environmental Impact Statement (CEIS) and an overall Dredging Management Plan (DMP) for dredging and the disposition of dredged materials for the total geographic region of Long Island Sound." The CEIS and DMP are to address the deposition of dredged material on land, habitat development, island creation, productive uses, and other alternatives. The EIR is supposed to provide the basis for considering the open water disposal alternative.

It is most difficult to examine just the EIR, and provide substantive comments regarding the overall problem -- comparisons, evaluations, assessments, etc. Much of the information and techniques used to prepare the "Issue Maps" and to support other heavily-weighted issues is not summarized in the EIR.

The EIR does make a commendable attempt to synthesize the existing information on the environment, biota, and most probable impacts of dredged material disposal. For the most part the Management Summary and Recommendations (pp. V-5ff) seem reasonable, based upon a brief review of the EIR. However, the overall Dredging Management Plan should attempt to determine more precisely the effects of dredged material disposal in the Sound.

cc: NEO Staff (route a copy)





**GENERAL COUNSEL OF THE
UNITED STATES DEPARTMENT OF COMMERCE**
Washington, D.C. 20230

JUL 24 1981

Colonel C. E. Edgar, III
Division Engineer
New England Division
U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

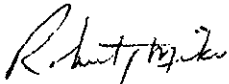
Attention: Mr. David Tomey, NEDPL-IP

Dear Colonel Edgar:

This is in reference to your draft environmental impact statement entitled, "Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region." The enclosed comments from the National Oceanic and Atmospheric Administration are forwarded for your consideration.

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving four copies of the final environmental impact statement.

Sincerely,


Robert T. Miki
Director of Regulatory Policy

Enclosure Memos from: Robert B. Rollins
National Ocean Survey
National Oceanic and Atmospheric
Administration

J. O. O'Connor
Office of Marine Pollution Assessment
National Oceanic and Atmospheric
Administration



F10

**GENERAL COUNSEL OF THE
UNITED STATES DEPARTMENT OF COMMERCE**
Washington, D.C. 20230

AUG 5 1981

Colonel C. E. Edgar, III
Division Engineer
New England Division
U.S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Attention: Mr. David Tomey, NEDPL-IP

Dear Colonel Edgar:

The Department of Commerce reviewed the draft programmatic environmental impact statement by the U.S. Army Corps of Engineers relative to the "Disposal of Dredged Material in the Long Island Sound Region," and forwarded comments to you in our letter of July 24.

Since that time, additional information has developed which is pertinent to the project. This additional information from the National Oceanic and Atmospheric Administration is enclosed for your consideration.

We are pleased to have been offered the opportunity to review this statement.

Sincerely,

A handwritten signature in cursive script, reading "Robert T. Miki", is written above the typed name.

Robert T. Miki
Director of Regulatory Policy

Enclosure Memo from: Ruth Rehfus
National Marine Fisheries Service
National Oceanic and Atmospheric
Administration



F10

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Services Division
Habitat Protection Branch
7 Pleasant Street
Gloucester, MA 01930

July 22, 1981

TO: PP/EC - Joyce M. Wood
FROM: *Ruth Rehfus*
F/NER54 - Ruth Rehfus

SUBJECT: Draft Environmental Impact Statement--Disposal of Dredged
Material in the Long Island Sound Region (CE) (DEIS 8105.31)

The Draft Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region that accompanied your memorandum of May 29, 1981, has been received by the National Marine Fisheries Service (NMFS) for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

General Comments

In our opinion the DEIS fails to address the problems associated with disposal of polluted material in Long Island Sound. It is our understanding that the problems this document was to address include:

1. The continued use of the New London site which has depths less than the desirable level of twenty meters and so could be subject to storm induced erosion.
2. Identification of an alternative site to the New London site.
3. The use of the Cornfield Shoals area allows dispersal of dredged material dumped there, yet the impact on the resources of Long Island Sound by such action has never been determined.
4. The mud cap covering the heavily polluted Stamford material at the New Haven dump has lost at least twelve percent of its volume while the sand structure remains stable. What has been done to recap the mud cover with sand or further stabilize this or any other disposal site with an entombment activity?
5. Capping as a disposal option for entombment of heavily polluted material is being developed as an implementable technique but the issues of insuring accurate placement and coverage on a routine basis continue to hamper broad acceptance of the technique. Can these problems be resolved and if so when?



6. What are the ramifications of openwater disposal of material laden with man-made contaminants?

We find little in the present documents that deals with these managerial issues which we believe are central to the assessment of impacts related to the management of dredged material disposal in Long Island Sound.

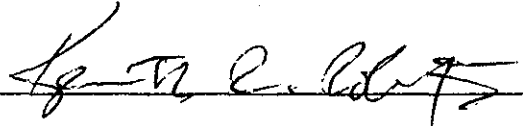
Appendix B (Long Term Impacts of Open Water Disposal of Dredged Material) and Appendix C (Economic Analysis of Future Dredged Material Disposal in Long Island Sound) at Section V, begin to deal with these pivotal issues. However, the main body of the document lacks site specific determinations regarding the real and potential problems of using the specified dump sites.

Appendix A to the DEIS is thorough, but does not correspond well to the main document on several points. These include the impacts of use of Cornfield Shoals and the New London site, as well as the need for determining area sensitivity at all dump sites. None of these issues is addressed in the DEIS; however, that document refers to Appendix A which identifies the existence of these problems.

Appendix A is based on a contractor's data analysis that attempted to weigh relative values of the resources of Long Island Sound. NMFS staff members who attended some meetings during its development raised numerous questions about the basis for the evaluation. To date those questions have gone unaddressed.

The statement that the entire DEIS was closely coordinated with NMFS and other federal agencies is incorrect. Except for the limited coordination on Appendix A, opportunities for NMFS input to the DEIS were confined to attendance at two hearings.

In our opinion these factors seriously fault the document. To correct the problems, we believe it would be advisable to withdraw them from circulation and redraft the EIS, using the contents of Appendices B and C as the basis for addressing the disposal of dredged material in Long Island Sound.

CLEARANCE	SIGNATURE AND DATE:
for, F/HP:R.Smith	 7/21/81



JOSEPH R. PISANI
36TH DISTRICT
WESTCHESTER COUNTY

THE SENATE
STATE OF NEW YORK
ALBANY

PLEASE REPLY TO
☐ SENATE OFFICE:
ROOM 505, THE CAPITOL
ALBANY, N. Y. 12247
TEL: 518/455-2831
☒ DISTRICT OFFICE:
251 NORTH AVENUE
NEW ROCHELLE, N. Y. 10801
TEL: 914/633-7090

July 16, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass 02254

RE: Draft Programmatic Environmental
Impact Statement for Disposal of
Dredged Material in the Long Island
Sound Region.

Dear Mr. Tomey:

I wish to go on record as strongly urging the following:

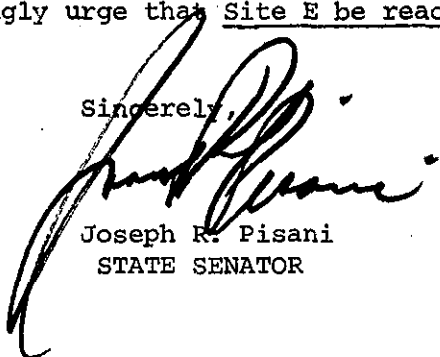
- 1) Western Long Island Sound should be re-opened for dumping of dredged spoils at least from the adjacent areas.
- 2) Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck East lying in Connecticut State Waters) should be re-opened immediately to dumping of dredged spoils.
- 3) Additional EIS's should be undertaken by the Army Corps of Engineers to locate additional dumping sites in Western Long Island Sound Waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island, and Eatons Neck West dump site.
- 4) That the concept of non-Federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.
- 5) More emphasis be given to the needs of the Sound Shore Communities of Western Long Island Sound encompassing lower Conn., Westchester County as well as those portions of L.I. Sound and New York City in the same vicinity.

Mr. David Tomey
July 16, 1981
Page 2

6) The figures of estimated dredging for the next fifty years in the Draft EIS for the Westchester area be increased from 250,000 cubic yards to 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than the Federal government.

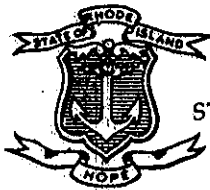
I hope these comments prove helpful in speeding the final EIS which is long overdue. The re-opening of dump sites in the Western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Sincerely,



Joseph R. Pisani
STATE SENATOR

JRP:cd



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

HISTORICAL PRESERVATION COMMISSION

Old State House
150 Benefit Street
Providence, R.I. 02903
(401) 277-2678

June 3, 1981

C. E. Edgar, III
Colonel, Corps of Engineers
Division Engineer
Department of the Army
New England Division, Corps of Engineers
424 Trapelo Road
Waltham, Ma. 02254

RE: Long Island Sound Disposal

Dear Colonel Edgar:

Our office has reviewed the "Draft Programmatic Environmental Impact Statement of the Disposal of Dredged Material in the Long Island Sound Region."

The analysis of impacts to cultural resources for the various disposal alternatives is adequate, and we have no suggestions for changes or additions.

Sincerely,

Eric Hertfelder
Deputy State Historic
Preservation Officer

/dn

52

Office of the
STATE
HISTORIC
PRESERVATION
OFFICER
for Connecticut

59 SOUTH PROSPECT STREET - HARTFORD, CONNECTICUT 06106 - TEL: (203) 566-3005

July 7, 1981

C. E. Edgar, III
Colonel, Corps of Engineers
New England Division
424 Trapelo Road
Waltham, MA 02254

Subject: Draft Programmatic Environmental Impact Statement
for the Disposal of Dredged Material in the
Long Island Sound Region

Dear Colonel Edgar:

The State Historic Preservation Officer has reviewed the "Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region". This office understands that this draft document provides a generic treatment of the impacts of seven dredged material disposal alternatives for the Long Island Sound Region. In the opinion of the State Historic Preservation Officer, this programmatic plan will have no effect upon historical, architectural or archaeological resources listed on or eligible for the National Register of Historic Places.

This office notes that this draft documentation does discuss the potential existence and impact of the disposal alternatives upon the area's cultural resources. This office suggests that this section would be strengthened through reference to the following study undertaken by the Institute for Conservation Archaeology on behalf of the Bureau of Land Management. This study is entitled "Summary and Analysis of Cultural Resources Information on the Continental Shelf from the Bay of Fundy to Cape Hatteras: Final Report

Volume I - Physical Environment

Volume II - Archaeology and Palaeontology

Volume III - Historic Shipping

Volume IV - Management

This office believes that this study provides a basis for the establishment of a comprehensive framework with respect to paleoenvironmental reconstruction and historical maritime data.

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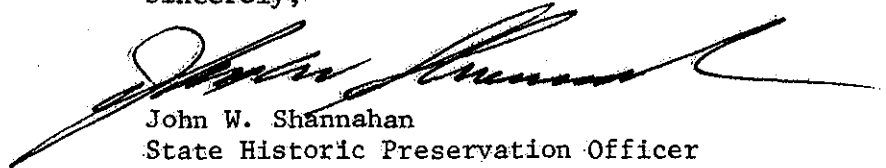
C. E. Edgar, III
Page 2
July 7, 1981

Specific plans and specifications forthcoming from this programmatic plan should be submitted to the State Historic Preservation Office for a cultural resource review in accordance with the National Historic Preservation Act of 1966 and Advisory Council guidelines 36 CFR 800.

This office appreciates the opportunity to have reviewed and commented upon this programmatic plan.

For further information, please contact David Poirier, Archaeologist.

Sincerely,

A handwritten signature in dark ink, appearing to read "John W. Shannahan", with a long, sweeping horizontal stroke extending to the right.

John W. Shannahan
State Historic Preservation Officer

DP:nbk

TRANSMITTAL SLIP

TO David Tomey
FROM Randolph Stelle DATE 7/21/81
RE:

Official Departmental comments on the PEIS will be mailed within the next day or two. Attached are additional comments received too late to be incorporated in the official comments. However there are several significant points which I have highlighted and are of concern to the Department.

FOR ACTION AS INDICATED:

- ☐ Please Handle
☐ Prepare Reply
☐ Prepare Reply for _____
Signature
☐ Information
☐ Approval
☐ Prepare final/draft in _____ Copies

- ☐ Comments
☐ Signature
☐ File
☐ Return to me
☐ _____
☐ _____

New York State Department of Environmental Conservation

MEMORANDUM

TO: Randy Stelle
FROM: Gordon Colvin *J.M. for bell*
SUBJECT: Comments on the New England Division Corps of Engineers Programmatic EIS for the Disposal of Dredged Material in the Long Island Sound Region.
DATE: July 16, 1981

The following are Region 2's comments on the New England Division Corps of Engineers Programmatic EIS for the Disposal of Dredged Material in the Long Island Sound Region.

General

Throughout this EIS many possible impacts, possible alternatives, etc. are mentioned but no thorough discussion or summary and reference to pertinent studies is made that would serve to evaluate the issues. In order for a generic/programmatic EIS to be useful there must be some substantive evaluations.

The PEIS falls far short of what we expected. It is not an EIS based on total management proposals for LIS dredged material, but is basically a document to be used in selecting open water dump sites. It notes that additional studies of land based disposal, containment sites, etc. are underway. Programmatic examination of alternatives, comparison of their costs, discussion of how they could be implemented, and decision-making procedures must be included in a PEIS. More attention should be given to other alternatives such as managing dredging (sequencing, reducing volume, abandonment of some dredging areas) to mitigate disposal impacts. Mitigation of impacts at disposal sites also requires more attention.

Because so much more detail is devoted to open water disposal, the PEIS concludes that alternative disposal methods must be determined case-by-case (Conclusion #2, P. I-2). This is an unacceptable conclusion, and was one of the principal issues in the New London litigation. Open water disposal will always appear as the only viable alternative until comprehensive analysis of other alternatives is conducted. This study and PEIS was to have included such analysis. It does not.

Specific

1. Fig. 2. An additional candidate site that should be evaluated is Northwest of site E located between the three historical sites. It was determined at a meeting of federal and state officials on May 13, 1981 that this area may be far preferable for a western LIS dredge material disposal site.

REC'D
JUL 20 1981
WATER RESOURCES

2. P. V-15 & Fig. 2. The reasons for excluding the current interim Cornfield site should be specified.
3. P. VI-7. Contrary to the statement at the bottom of this page, it is our opinion that the techniques used during current bioassays are not able to detect sub-lethal effects.
4. P. VI-9, last par: This is not an adequate assessment of potential dredge material toxicity. A review of established literature on acute toxicity, bioaccumulation and biomagnification is required. See, for example, Appendix C of the Mitre Corp. Report for N.Y. District Corps of Engineers.
5. P. VI-10, line 7: "Highly" contaminated dredge material should not be disposed of in LIS unless it can be rendered harmless. At any rate, this term has no technical or legal meaning and should not be used.
6. P. VI-10, last par: What contaminant has been shown to magnify through the (aquatic?) food chain? (We assume it is mercury). The ultimate concern here is not for the minimal impact on benthos populations, but the contamination of human food resources.
7. P. VI-11, 1st par: Clarify the context of this paragraph. Long Island Sound and the New York Bight are dissimilar.
8. P. VI-35: Regarding the sentence "However,... proper management.", statements of this sort require more support than is given. For example, specifically how can such problems be mitigated?
9. P. VI-39 Containment Facilities: DEC recently reviewed and commented on NED studies which identified proposed containment sites. A discussion of these sites and comments on them must be included here.
10. P. VI-41, last par: It seems premature to consider two prototype facilities when all the dredge material from LIS may take many years to fill one.
11. P. VI-42, end of last par: This discussion is conclusory and may very well not be able to be substantiated.
12. P. VI-49, last par: Refer to EPA standards for soil applications (e.g., TSCA regulations for Cd, PCB and RCRA regulations for hazardous wastes). More importantly, the USDA regulations must be discussed.
13. P. VI-50, last par: Has the possibility of combining dredge material and fly ash been studied? If so, summarize and discuss the implications.
14. P. VI-52, 2nd par: Discuss what legal constraints mandate cessation of dredging should there be no management plan.



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Administration
STATEWIDE PLANNING PROGRAM
265 Melrose Street
Providence, Rhode Island 02907

July 21, 1981

C.E. Edgar, III
Colonel, Corps of Engineers
Division Engineer
New England Division
424 Trapelo Road
Waltham, MA 02254

Dear Colonel Edgar:

This office, in its capacity of Clearinghouse designate under OMB Circular #A-95, Part II, has received the "Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region."

The Technical Committee of the Statewide Planning Program was presented the staff findings as a result of the review at its meeting of July 3, 1981. The report suggests the need for further study of the Block Island Sound site and evaluation of open water sites further east in Rhode Island since most dredging occurs in the eastern portion of the state. This study would compare new sites with those already used, such as Brown's ledge and an area near Conimicut Light. Such a study would be initiated by a dredging project in Rhode Island for which an economical and environmentally safe disposal site is not available. The Technical Committee recommends that the study be conducted and that this study be coordinated with the Fall River Dredging Project.

Yours very truly,

Rene J. Fontaine
A-95 Clearinghouse Coordinator

RJF/cec

INTER-OFFICE MEMO

TO Mr. Rene' Fontaine, A95 Coordinator

DATE: July 6, 1981

DEPT Statewide Planning Program

FROM Kaye Rands, Jr. Planner

DEPT Statewide Planning Program

SUBJECT Environmental Impact Report on Open Water Disposal of Dredged material
in Long Island Sound, Block Island Sound and adjacent waters. EIS-81-07.

The only disposal site studied which is within Rhode Island borders appears to offer no advantage over the existing disposal site being used for dredgings from Eastern Long Island Sound and Block Island Sound. It will not be used until the existing site reaches its limit on capacity, or some environmental impacts become evident through the Disposal Area Monitoring System.

However, the site chosen, which is near/New London, is a longer distance from possible dredging sites in Eastern R.I. Further study is recommended, for the discarded site nine miles out from the mouth of the Pawcatuck River, and to compare sites previously used in Eastern R.I. with possible new sites.

We also recommend that such a study be conducted.

Kaye F. Rands
Jr. Planner.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
INTER-OFFICE MEMO

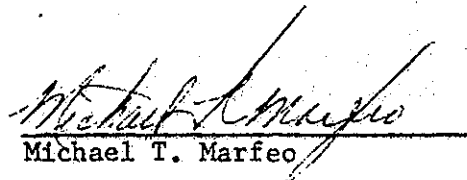
TO : Rene J. Fontaine, Principal Planner
Statewide Planning Program
DEPT : Administration

DATE: May 29, 1981

FROM : Michael T. Marfeo, Community Assistance Specialist
Statewide Planning Program, Review Section
DEPT : Administration

SUBJECT: EIS-81-07; Program for Disposal of Dredged Material in the Long Island Sound Region.

Since Rhode Island is in need for dredging its waters in order to maintain and improve its commercial, recreational and fishing ports and various channels leading to them; we agree with the concept of the project. However, we do recommend that all alternatives be considered for disposal of the materials. Deep Ocean Disposal appears to be the more favorable method for large volumes of dredged material, provided the area for disposal is not a prime fishing ground and that the dredged spoils be dumped only within the confines of the approved site.


Michael T. Marfeo

MTM/sjc

INTER-OFFICE MEMO

54

TO : Mr. Daniel W. Varin, Chief
DEPT : Statewide Planning Program
FROM : John A. Lyons, Chairman *JAL*
DEPT : Coastal Resources Management Council
SUBJECT: EIS 81-07 Corps of Engineers Long Island Sound Dredged Material Disposal draft EIS. DATE: June 23, 1981

The draft has noted that detailed information is lacking for site D in Block Island Sound, the alternative site most affecting Rhode Island. The site does appear to have potential environmental disadvantages. Moreover, since most of the Rhode Island dredging projects are located in the eastern portion of the state, in the mid to upper bay, site D does not appear to be an economical alternative. We concur with the Corps finding that "evaluation of the environmental suitability of potential open water disposal sites further east in Rhode Island Sound could provide meaningful assessments upon which to make recommendations for this region."

Also, we recommend that if sites F and G which "will continue to be used as regional disposal sites," are abandoned, closed, or otherwise fall into disuse, the Corps not consider opening site D until the general and specific levels of information on the impacts associated with disposal at that site have been thoroughly upgraded. This applies particularly to impacts on commercial fishing and the ability of the site to retain the material without interference from currents.

JAL/LRW/lmc

JUN 24 1981

7/8/81 11:28:45:6



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Transportation
PLANNING DIVISION
State Office Building
Providence, R. I. 02903

June 2, 1981

Mr. Rene Fontaine
Office of State Planning
265 Melrose Street
Providence, RI 02907

Dear Mr. Fontaine:

RIDOT has no comment on project no. EIS-81-07 program for disposal of dredged material in the Long Island Sound Region.

Sincerely,

Joseph F. Arruda, Chief
Planning Division

JFA/JPH/ea



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

HISTORICAL PRESERVATION COMMISSION

Old State House
150 Benefit Street
Providence, R.I. 02903
(401) 277-2678

June 3, 1981

Mr. Daniel W. Varin, Chief
Rhode Island Statewide Planning
265 Melrose Street
Providence, RI 02907

RE: EIS-81-07

Dear Mr. Varin:

Our office has reviewed the "Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region."

The analysis of impacts to cultural resources for the various disposal alternatives is adequate, and we have no suggestions for changes or additions.

Sincerely,

Eric Hertfelder
Deputy State Historic
Preservation Officer

/dn

REC
102
1000AM

JUN 4 1981

7 8 9 10 11 12 1 2 3 4 5 6



ROBERT F. FLACKE
COMMISSIONER

STATE OF NEW YORK
DEPARTMENT OF
ENVIRONMENTAL CONSERVATION
ALBANY, NEW YORK 12233

JUL 22 1981

Dear Colonel Edgar:

This letter is in response to your request for this Department's review and comments on the "Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region".

Of important note in this Draft is the lack of any reference in the Summary to the establishment of a fourth disposal site in Long Island Sound. In our estimation it is apparent that this is one of the intentions of this document since Figure 2 in Section II indicates candidate sites and Appendix A defines the site selection process.

From an environmental viewpoint, the Department would not support the establishment of a fourth dredge spoil disposal site in western Long Island Sound but we recognize that the increasing financial impact on commercial, recreational and private interests created by lack of suitable and convenient sites may be detrimental to overall state interests.

The EIS appears to indicate that open water disposal is more cost effective and has the least environmental impact. If this is so, the preferred site from our viewpoint is Site A (Bridgeport). However, we are concerned that alternative means of disposal of dredged material are only identified and not evaluated to any extent in the EIS. These alternatives require evaluations before decisions can be made.

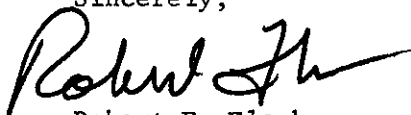
Following are additional general comments regarding the Draft PEIS. Specific comments relative to editorial comments are contained in an attachment to this letter.

- A. In general the Programmatic EIS seems to provide a reasonably good analysis of open water disposal and virtually nothing on other alternatives. Also, the main EIS should be more forceful in presenting the findings of the Appendices (particularly Appendix A, which has some very good reviews of literature on impacts). The main EIS is also weak on the economic and social aspects.

- B. Of the sites in the western basin, we feel that Site A is preferable. There has been some discussion that Site E has a potential for clean materials but there is not sufficient confidence that restrictions can be maintained well enough to support that site.
- C. Chapter II of Appendix A contains Dames and Moore's environmental suitability study. In the past the Department has expressed concern over the ranking methodology which gives greater weight to the distance traveled to a sample station than it gives to the effect of disposal on water quality. (Correspondence re. this point is attached). It is our view that in the event another site is to be selected that studies be done relative to current patterns, benthic organisms, water quality, etc. in order to have comprehensive background information prior to any disposal program.
- D. Main EIS, Page VI-2 - The categorization of short and long-term impacts as being less than or more than two years would, I believe, place most of the DAMOS work in the long-term impact data category. However, we don't believe that there is general agreement that the DAMOS data does represent long-term data.
- E. Main EIS, Page VI-22 - Future studies should include the long-term impact of contaminated material disposal at the historic Stamford and Eaton's Neck sites.
- F. Appendix A, Pages IV-11 thru 21 - The information on water quality and ecological impacts of dumping has not been forcefully and clearly expressed in the Main EIS (see comments A and D).

I trust that the foregoing and the attached editorial comments will be of assistance to you in finalizing the PEIS.

Sincerely,



Robert F. Flacke

Attachment

Colonel C.E. Edgar III
Division Engineer
New England Division
Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Editorial Comments - Main EIS

1. Page I-3 -- the regulatory role of the States could be better explained here and in Appendix A (Page I-6). This should include Connecticut's primacy in certifying the interim and proposed sites.
2. Page II-7, para. 1 -- This discussion should be expanded to cover suitability of methods for dredging in confined areas and shallow draft harbors.
3. Page II-8, para. 3 -- The possibility of additional congressional authorization of Corps. jurisdiction in specific projects should be mentioned (per Page I-5,para 1)
4. Chapter IV - - The entire chapter presentation would be improved by comparison tables of disposal alternative economics, on both a general basis and by comparison of specific projects.
5. Page IV-13 -- Use as landfill cover could probably come under resource reclamation (when compared to several of those presented), by making alternate landfill cover materials available for other purposes.
6. Page IV-18, NEPA -- is the objective limited only to the effect on human environment?
7. Page V-2 --The general counterclockwise circulation exhibited by the littoral drift might be mentioned.
8. Page V-13, line 10 -- The use of coarser grained (when less contaminated) sediments are also useful for spoil mound capping in significant quantities.
9. Page V-16 -- Site E (Stamford/Eatons Neck) might still be considered as potential site if limited to clean spoil and Westchester pressures increase.
10. Page VI-6, para. 1 -- In addition to dilution, there is also buffering and sorption (Appendix B, Page IV - 11 through 21).
11. Page VI-8, para. 2 -- If the attempted site study was Eatons Neck, it should be named. Also, it should be clarified that it was not the attempt to determine long-term impacts that was unsuccessful, but the attempt to conduct the study to do so.
12. Page VI-8, Long term impacts -- The discussion has a generally negative tone. The positive side, such as desirable lobster habitat, should also be discussed, (as well as in situ contaminant removal).
13. Page VI-30, para. 1 -- The erosion issue is questionable. One would think that most erosion at these sites, in the long term, would already have occurred by now.

14. Page VI-34, para. 1 -- Could also include pH management.

para. 4 -- Based on the title of the 1978 Smith reference, it is not clear whether anything more than "interest" has been generated. If there are no significant findings (e.g. guidelines), then it may not be worth mentioning.

15. Page VI-51, para. 3 -- There may be continuous, unreduced contaminant releases in situ, which are probably in more ecologically sensitive areas.

16. Page VI-52, para. 1 -- natural river-borne loading and resuspension of (contaminated) harbor sediments are likely to continue regardless of the State and Federal point discharge program accomplishments.

17. Page VI-SS, Table II -- Table should be checked to make sure relative impacts are clear. For example, environmental impacts of open water alternatives (deep ocean, near shore, and river/harbor) do not really provide guidance on relative impacts (especially the latter two).

B. Editorial Comments - Appendix A

1. Pages I-13, 14 -- Tables I.D-3 and I.D-4 should have same percentages for each basin (as do tables I.D-5 and I.D-6).

2. Page IV-7, para. 2 -- Lobster habitat relative to bottom contours should be mentioned.

C. ~~Typographical~~ Main EIS



Stanley J. Pac
Commissioner

State of Connecticut

Department of Environmental Protection

State Office Building Hartford, Connecticut 06115



July 23, 1981

Colonel C. E. Edgar
Division Engineer
New England Division
Army Corps of Engineers
429 Trapelo Road
Waltham, Massachusetts 02254

Dear Colonel Edgar:

The Department of Environmental Protection has reviewed the Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region and its appendices (PEIS). Because this draft is intended to be a "living" document we have evaluated it in the context of long-range planning for management of dredged material disposal in the Long Island Sound region. Therefore, our comments focus on three aspects of the draft and appendices:

- the sufficiency of the draft as an information base on which future site-specific supplemental EIS/EA's can be developed;
- the utility of the Dames and Moore report (appendix A) on a site selection process; and
- the suitability of the sites selected for in-depth study.

With regards to use of the draft PEIS as the basis for tiering we note the following points.

Alternatives for Dredged Material Disposal

Currently, of the four major groups of disposal alternatives, three are actively being studied: open water disposal, disposal in containment facilities and upland disposal. Information on the fourth "general" group comes chiefly from site-specific studies on an as-needed basis. While the document under review gives a general overview, it is geared primarily towards investigation of the open water disposal alternative. Appropriately, the Corps' ongoing study of containment facilities is cross-referenced. However, please note that my Department is currently evaluating the upland disposal alternative in Connecticut, a task funded under the authority of the Water Resources Planning Act of 1965. Until proven otherwise, we can only say land disposal "may not be viable option" (Table 1, P. 1-4). It is DEP's position to examine all possible alternatives for each project, rather than rely solely on open water disposal.

Regulatory Jurisdiction

Table 3 on p. 1-8 should contain all of the Connecticut laws which may apply to dredged material disposal alternatives. These laws are:

Tidal Wetlands Statutes (Sections 22a-28 through 22a-35, Connecticut General Statutes) pertinent to all alternatives except open water.

Inland Wetlands and Water Courses Act (Sections 22a-36 through 22a-45, Connecticut General Statutes) pertinent to all alternatives except open water.

Structures, Fill and Dredging in Tidal, Coastal and Navigable Waters (Sections 25-7b through 25-7f and Sections 25-10 through 25-18, Connecticut General Statutes) pertinent to all alternatives except open water and upland.

Stream Channel Encroachment Lines (Sections 25-4a through 25-4g, Connecticut General Statutes) pertinent to containment and, depending on where material is stored, incineration and resource reclamation.

Water Discharge Permits (Section 25-54, Connecticut General Statutes) pertinent to upland, containment and, depending on where the material is stored, incineration and resource reclamation.

Solid Waste Permit (Sections 19-524b and 19-524c, Connecticut General Statutes) pertinent to upland, containment, incineration and resource reclamation alternatives.

Air Compliance Permits (Sections 19-508-1 through 19-508-25, Connecticut General Statutes) pertinent to incineration.

Connecticut Environmental Policy Act (Sections 22a-1 through 22a-1f, C.G.S.) pertinent to state actions on any disposal alternative.

Rhode Island's laws should also be included to complete the list.

With regards to statutory authority, the third sentence of the first full paragraph on p. II-8 is not wholly accurate and therefore misleading ("The states have total control....waters."). Although it is true that a disposal site in state waters cannot be used without issuance of a Section 401 Water Quality Certificate from the respective states, there is no institutionalized mechanism to control project priorities. The Dredging Management Work Group provides the opportunity to manage the disposal of dredged material at the disposal sites so as to link projects to facilitate capping, and, to consolidate information about dredging needs. Available funding also affects project priorities.

On the other hand, because the state laws applicable to dredging and dredged material disposal are geared to habitat and species protection, conditions are often placed on the Water Quality Certification. The conditions restrict the timing and location of dredging activities. Hence, valuable benthic habitat and sensitive periods in shellfish and anadromous fish life cycles are protected. Any proposal for dredging or dredged materials disposal which would adversely impact our fisheries, shellfisheries or coastal waters resources would be inconsistent with our coastal management program.

Predictions of Future Need

Although maintenance of existing channels, basins and anchorages is anticipated for the future, it is a Connecticut Coastal Management Act (CCMA) policy to discourage future new work dredging of federal projects in Connecticut harbors. Given that the level of petroleum imports is stabilizing and that any coal imports would likely be shipped by barge, it may be possible to utilize existing channel depths in the major ports. Therefore the volume of material to be expected from Federal projects may be closer to the Minimum Growth Scenario of Appendix C. However, even without any major new work dredging, maintenance work in the western basin of Long Island Sound and in the fast-shoaling recreational harbors east of New Haven will continue to tax existing disposal options. This need is reflected in our recommendations for location of disposal sites.

The Affected Environment

In Connecticut, dredging and dredged material disposal is timed to avoid shellfish spawning seasons and anadromous fish runs. In your discussion of Fisheries and Shellfisheries in Section V of the draft PEIS, it is advisable to mention the occurrence of these sensitive life cycle events for informational purposes. A discussion of life cycles and migration is important for a basic understanding of the Sound's estuarine ecosystem.

Under Rare and Endangered Species, no mention is made of existing state programs for rare and endangered species. In Connecticut, the Natural Resources Center of my Department administers a program to protect rare and endangered plants, animals and habitats. Some of the natural areas to be protected are along the shoreline and on offshore islands. Please contact Les Mehrhoff (203-566-3540) for more information. Osprey are nesting along Connecticut's shoreline and are monitored by Tom Hoehn of my Wildlife Unit (203-566-4683). Future plans for dredged material disposal should include protection of these sites and coordination with the respective states which conduct such programs.

Interim Plan for the Disposal of Dredged Material from Long Island Sound

A major defect in the Draft PEIS is the lack of a management concept for the operation of open water disposal sites. In the absence of such a long-range dredging management plan, federal and state agencies involved in the open water disposal of dredged material have agreed to abide by the terms of the Interim Plan. Because the Interim Plan is an element of

Connecticut's Coastal Management Program, its guidelines apply to all dredging or disposal activities within the coastal boundary. If it was intended that the NERBC Interim Plan continue as the management document, then this should be made clear. The Interim Plan should either be attached to the PEIS as an appendix, or at least discussed under Section 1, Summary.

The Interim Plan guidelines provide for a dredged material classification system based on percentages of oil and grease, volatile solids, water and silt-clay particles in samples of the material to be dredged. Classification of sediments by this method is in keeping with the analyses presented in Appendix B. Further sediment testing by bulk chemical analysis for metals, elutriate tests and bioassay/bioaccumulation studies can refine or confirm the initial classification of sediments. Sediment classification is important for determination of an appropriate disposal option and development of mitigation techniques.

With regards to Appendix A, the Environmental Impact Report (EIR) on Open Water Disposal prepared by Dames & Moore, we make the following comments.

Site Selection Process

The consultant failed to provide the initial work or source data maps from which all the composite maps were derived. The value of the suitability map is wholly dependent on the accuracy of the data mapped on those maps. Therefore it is impossible for a reviewer to independently confirm the results of the site selection procedure. Nevertheless, the EIR does provide valuable information about the characteristics of the disposal sites selected by the process. It is this type and degree of analysis that is expected for any site proposed for an open water disposal site.

Proposals for Disposal Sites

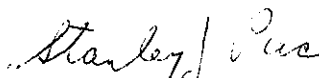
1. New London Disposal Area (Site G). This site should be designated as the Eastern Long Island Sound Regional Disposal Area.
2. Connecticut River Regional Disposal Area (Cornfield Shoal). We concur with the Draft PEIS that use of the Six Mile Reef Site (Site C) offers no obvious benefits over continued use of the existing Connecticut River site. However, the Draft PEIS fails to conclusively show that a better site does not exist which may more economically serve the Clinton Harbor area. Clinton dredgers have repeatedly expressed the need to reopen the historical Clinton dumping grounds. The relative merits of establishing a site off Clinton versus maintaining the disposal site at Cornfield Shoal should be explored and decided in the revised draft.
3. Central Long Island Sound Regional Disposal Area (Site F). We concur that relocating this site to the Branford Site (Site B) offers no obvious benefits at this time. Relocation would significantly increase disposal management costs as monitoring at both old and new sites would be required.

4. Bridgeport Regional Disposal Area (Bridgeport East - Site A). We concur with the Draft PEIS that this site appears to be a suitable disposal area. However, the relative merits of opening a new site versus reopening the historical Bridgeport Dumping Ground should be more fully evaluated in the revised draft.
5. Western Long Island Sound Regional Disposal Area. The Draft PEIS fails to address the western Long Island Sound dredgers or provide them with a realistic disposal option. We hold the opinion that the Bridgeport site will not be economically viable for most private recreational projects in western Fairfield and Westchester Counties, or the nearby north shore of Long Island due to the long distance hauling required. This Department has supported establishing a site to serve western Long Island Sound in the past and will continue to do so in the future until it is conclusively shown that a suitable site does not exist. In light of the user interest in establishing a site in the western part of the Sound and the fact that the Corps has had several alternative sites under consideration for several years, the revised PEIS Draft should decide the matter of establishing a western Long Island Sound open water disposal area. In the past, the Department has advocated locating a site in Connecticut waters northwesterly of the historical Eastons Neck Disposal Area. Indeed, the Corps held public hearings several years ago on this proposed disposal area, but never brought the matter to a conclusion one way or another. Revision of the Draft PEIS provides an opportunity to decide the suitability of this proposed site as well as the others under consideration for the area.

With regard to the December 28, 1976 agreement in settlement of the matter of Navy dredging of the Thames River, the Department finds that the PEIS adequately addresses the issue of availability and suitability of disposal sites in Block Island Sound and nearby ocean waters. However, the Dames and Moore report (appendix A) is insufficient for our purposes to draw a similar conclusion for Long Island Sound. We do concur that the existing New London disposal site should continue to be used for disposal of materials suitable for open water disposal. As noted above, we believe that previously identified sites to serve western Long Island Sound should be thoroughly evaluated and determined in the revised PEIS.

The Department is very interested in being involved in the selection of open water disposal sites in the Connecticut waters of Long Island Sound. Please contact Arthur Rocque (203-566-7404) of my Planning & Coordination/Coastal Management Unit should you have any questions. I thank you for this opportunity to comment on the draft PEIS and look forward to continued cooperation with the Corps.

Sincerely,


Stanley J. Pac

COUNTY OF SUFFOLK



PETER F. COHALAN
SUFFOLK COUNTY EXECUTIVE

DEPARTMENT OF HEALTH SERVICES

June 8, 1981.

Division Engineer, New England Division
U. S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Att: Mr. David Tomey, NEDPL-IP

Re: Draft Programmatic Environmental Impact Statement for the Disposal
of Dredged Material in the Long Island Sound Region

Gentlemen:

Cursory review of the above referenced material reveals that much information concerning the Block Island Sound region has been omitted. In particular, I refer to the work performed at the New York Ocean Science Laboratory with which, for obvious reasons, I am familiar. Included among this work are:

Alexander, J. E. and T. T. White 1974. An interdisciplinary study of the estuarine and coastal oceanography of Block Island Sound and adjacent New York coastal waters: ground truth. Part III. Chemical Oceanography NYOSL Tech. Rept. No. 27

Austin, H. M. and P. M. Stoops 1973. A synoptic study of the surface waters of Block Island Sound and surrounding waters. NYOSL Tech. Rept. No. 24.

Hollman, R. 1976. Environmental atlas of Block Island and Long Island Sound waters. Vol. II. Physical and chemical data base at observed and standard depths. 1970-73. NYOSL Tech. Rept. No. 35

To: Mr. David Tomey

-2-

June 8, 1981

Hollman, R. and S. Gill 1974. An interdisciplinary study of the estuarine and coastal oceanography of Block Island Sound and adjacent New York coastal waters: ground truth. Part II. Physical oceanography. NYOSL Tech. Rept. No. 27.

Nuzzi, R. 1973. A synoptic study of the surface waters of Block Island Sound and surrounding waters. Part I. NYOSL Tech. Rept. No. 19.

Nuzzi, R., S. F. Bruno and R. D. Staker 1978. Environmental atlas of Block Island and Long Island Sound Waters. Volume V. Phytoplankton Data Base 1970-1973. NYOSL Tech. Rept. No. 38.

Nuzzi, R. and U. G. Perzan 1974. An interdisciplinary study of the estuarine and coastal oceanography of Block Island Sound and adjacent New York coastal waters: ground truth. Part IV. Phytoplankton and suspended particles. NYOSL Tech. Rept. No. 27.

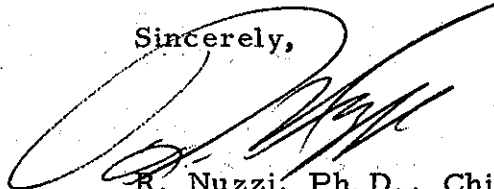
Staker, R. D. and S. F. Bruno 1978. An annual phytoplankton study in coastal waters off eastern Long Island (Block Island Sound). Botanica Marina 21: 439-449

Staker, R. D., S. F. Bruno and R. Nuzzi 1978. The phytoplankton of Block Island Sound: 1970 - 73. Nova Hedwigia 30: 697-724.

Yost, E., R. Hollman, J. Alexander and R. Nuzzi 1973. An interdisciplinary study of the estuarine and coastal oceanography of Block Island Sound and adjacent New York coastal waters. NASA Tech. Rept., Greenbelt Md. 178 pp.

Any work map composed without reference to these investigations must be considered as unacceptable for the Block Island Sound region as the above works probably constitute a portion of the most comprehensive data set available for Block Island Sound.

Sincerely,



R. Nuzzi, Ph. D., Chief
Marine Monitoring Unit

RN:ets

**DEPARTMENT OF PUBLIC WORKS**

CITY HALL

GLEN COVE, N.Y. 11542

JOSEPH P. HURLEY, P.E.
DIRECTOR

(516) 676-2000

June 9, 1981

Division Engineer
New England Division
U. S. Army Corps of Engineers
424 Trapelo Road
Waltham, Massachusetts 02254

Attention: Mr. David Tomey, NEDPL-IP

Dear Sir:

We have received a Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region, and wish to bring to your attention a matter which directly affects the City of Glen Cove.

Listed in the report as a Federally authorized navigation project is Glen Cove Creek and harbor. Dredging of this creek was to have taken place in 1979, with disposal of the dredged material at an upland site provided by the City. Dredging has been suspended due to concern expressed by the local Nassau County Health Department and the New York State Department of Environmental Conservation concerning contaminants present in the sediment. Further investigation by the State has resulted in a determination that this material is considered a hazardous waste. This in effect prohibits any land disposal alternative.

At the present time the City has been informed by the Corps of Engineers, New York District, that dredging will commence only after the City agrees to pay the disposal costs for ocean disposal of this material. This is a financial impossibility for the City and appears to differ with the Federal regulations for disposal should an environmentally unacceptable land disposal site be provided by the local cooperating agency. It would seem that situations such as the above be formally addressed in the Environmental Impact Statement.

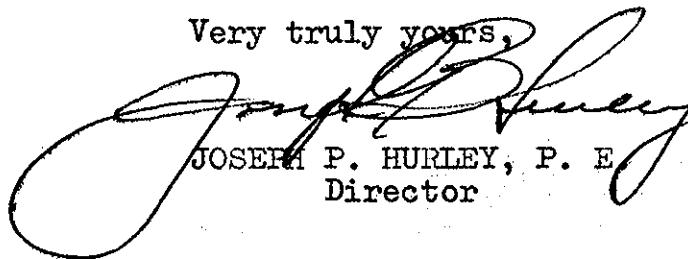
New England Division
U. S. Army Corps of Engineers

-2-

June 9, 1981

I would appreciate receiving any comments you may have on the above.

Very truly yours,



JOSEPH P. HURLEY, P. E.
Director

JPH:kr

cc: Mayor Parente



ALFRED B. DEL BELLO
County Executive

June 22, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Re: Draft Programmatic Environmental
Impact Statement for Disposal of
Dredged Material in the Long Island
Sound Region.

Dear Mr. Tomey:

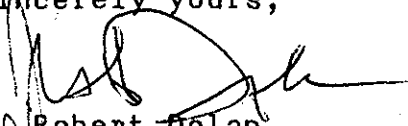
I wish to go on record as strongly urging the following:

- 1) Western Long Island Sound should be reopened for dumping of dredged spoils at least from the adjacent areas.
- 2) Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck lying in Connecticut State Waters) should be reopened immediately to dumping of dredged spoils.
- 3) Additional EIS's should be undertaken by the Army Corps of Engineers to locate additional dumping sites in Western Long Island Sound Waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island, and Eatons Neck West dump site.
- 4) That the concept of non-Federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.
- 5) More emphasis be given to the needs of the Sound Shore communities of Western Long Island Sound encompassing lower Connecticut, Westchester County, as well as those portions of Long Island Sound and New York City in the same vicinity.
- 6) The figures of estimated dredging for the next fifty years in the Draft EIS for the Westchester area be increased from 250,000 cubic yards to 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than the Federal government.

Mr. David Tomey
June 22, 1981
Page 2

I hope these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the Western section of Long Island Sound is critical and I strongly urge that Site E be reactivated immediately.

Sincerely yours,



J. Robert Dolan
Executive Officer

JRD/lm



CITY OF NEW ROCHELLE
NEW YORK

C. SAMUEL KISSINGER
CITY MANAGER

June 23, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Re: Draft Programmatic Environmental
Impact Statement for Disposal of Dredged
Material in the Long Island Sound Region

Dear Mr. Tomey:

I am writing this letter on behalf of Shore Acres Point Corporation and twenty-two other individuals, corporations, organizations, marine and clubs, all of whom are land owners surrounding the Mamaroneck Harbor. We welcome this opportunity to commend on the Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound Region.

One of the most serious problems facing the Sound Shore Communities of Westchester and other areas on Western Long Island Sound is the increasingly critical need for dredging the harbors, waterways and marine recreational areas; and the disposal of such dredged spoils at a reasonable cost and in an environmentally acceptable manner. We wish to go on record as strongly urging the following:

1. Western Long Island Sound should be reopened for dumping of dredged spoils at least from the adjacent areas.
2. Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck East lying in Connecticut State Waters) should be reopened immediately to the dumping of dredged spoils.
3. Additional EIS's should be undertaken by the Army Corps of Engineers to locate additional dumping sites in Western New York State Long Island Sound waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island and Eatons Neck West dump site.

Page 2

Re: Draft Programmatic Environmental
Impact Statement for Disposal of Dredged
Material in the Long Island Sound Region
June 23, 1981

4. That the concept of non-federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.
5. More emphasis be given to the needs of the Sound Shore Communities of Western Long Island Sound encompassing Lower Connecticut, Westchester County as well as those portions of Long Island and New York City in the same vicinity.
6. The figures of estimated dredging for the next fifty (50) years in the Draft EIS for the Westchester area be increased from 250,000 cubic yards to at least 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than federal government.

Upland disposal sites in the Westchester area are virtually non-existent for either governmental or non-governmental potential dredging projects. The only two alternatives are ocean disposal or Long Island Sound disposal. Ocean disposal requires a specific type of barge equipment which has limited availability in New York. The cost of using such equipment is significantly more expensive than other types of barge disposal equipment. Also, limitation on the number of trips per day and number of barges per day that can go through Hell's Gate further increases the cost of dredging. In a recent project in Westchester, costs were estimated to be increased by over 50% as the result of ocean disposal.

If one turns from ocean disposal to Long Island Sound, the distance from Westchester Sound Shore Communities to the nearest approved active dredged site is off of New Haven, Connecticut some 45-50 miles away. The cost savings for Westchester or nearby Long Island projects using New Haven vs. ocean disposal should be \$2.00 to \$4.00 per cubic yard. However, if this excessive distance were reduced by a closer site - such as Site E (Eaton's Neck East) the cost savings should be increased an additional \$1.50 to \$3.00 per cubic yard. This could mean a total savings of \$3.00 to \$7.00 per cubic yard over ocean disposal or \$300,000 to \$700,000 for each 100,000 cubic yards dredged. (This cost information was estimated within the last three months by two dredge contractors certified for both ocean and Long Island Sound dumping). It should be noted that opening of Site E (Eaton's Neck East) would mean that the distance from the Westchester and nearby Long Island Sound Shore Communities to the nearest approved disposal area would be in line with distances to other regional sites from neighboring Long Island Sound Communities. (This can be seen from Figure 2 of the Draft EIS).

Page 3

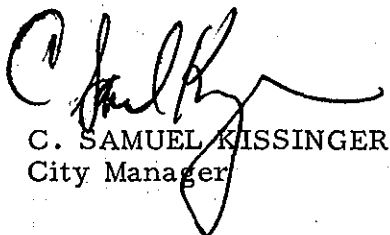
Re: Draft Programmatic Environmental
Impact Statement for Disposal of Dredged
Material in the Long Island Sound Region
June 23, 1981

We are further concerned that very little emphasis has been given to the needs of the Western area of Long Island Sound. In short, one can feel like an unwanted child. We suggest that the EIS be finalized without delay and that additional EIS' be commenced on additional dumping sites in Western Long Island Sound - New York State waters. This search should include a review of such deep hole areas as Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island off New Rochelle and Eatons Neck West.

Two major shortcomings of the present Draft EIS are that only Federal maintenance dredging is considered, thus excluding other non-Federal maintenance dredging figures, and the extremely low estimates for the next fifty years of the amount of Federal maintenance dredging that will be done in the Westchester area. It is short-sighted at best to look only at Federal projects. Unless the area from the shore line to the channel and Federal anchorage areas is dredged, boats will not be able to get to shore. Therefore, the Federal dredging is only partially solving the problems that exist and the amount of non-Federal dredging in many cases will be four times or more than of the Federal projects. In Mamaroneck, the Federal project just completed was approximately 20,000 cubic yards and the amount of non-Federal dredging will be approximately 80,000 cubic yards. Table C-15 grossly understates the amount of Federal maintenance dredging to be undertaken in the next fifty years. Mamaroneck Harbor (based upon the just completed project) should run approximately 120,000 cubic yards. Milton Harbor, Larchmont Harbor and Echo Bay show no dredging over the next fifty years. Yet, the Federal government is going to public notice shortly for a large project in Milton Harbor. New Rochelle shows nominal dredging as does Portchester. In short, the total figures for the federal maintenance dredging should be estimated at over 1,000,000 cubic yards without any of the non-Federal work which could run over four times the Federal projections, or 4,000,000 cubic yards.

We hope that these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the western section of Long Island is critical and we strongly urge that Site E be reactivated immediately.

Very truly yours,


C. SAMUEL KISSINGER
City Manager

CSK/kr

Village of Port Chester



New York

110 Willett Avenue
Port Chester, N. Y. 10573

June 23, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapeolo Road
Waltham, Massachusetts 02254

Re: Draft Programmatic Environmental Impact Statement for
Disposal of Dredged Material in the Long Island Sound Region

Dear Mr. Tomey:

I wish to go on record as strongly urging the following:

1. Western Long Sound should be reopened for dumping of dredged spoils at least from the adjacent areas.
2. Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck East lying in Connecticut State waters) should be reopened immediately to dumping of dredged spoils.
3. Additional EIS's should be undertaken by the Army Corps of Engineers to locate additional dumping sites in Western Long Island Sound waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island and Eatons Neck West dump site.
4. That the concept of non-Federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.
5. More emphasis be given to the needs of the Sound Shore communities of Western Long Island Sound encompassing lower Connecticut, Westchester County as well as those portions of Long Island Sound and New York City in the same vicinity.

Mr. David Tomey

- 2 -

June 23, 1981

6. The figures of estimated dredging for the next fifty years in the Draft EIS for the Westchester area be increased from 250,000 cubic yards to 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than the Federal government.

I hope these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the Western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Sincerely,


Michael D. Ritchie
Village Manager

MDR:bb

VILLAGE OF



MAMARONECK

Village Hall

Mamaroneck, N. Y. 10543

OFFICE OF THE
VILLAGE MANAGER

TELEPHONE
898-7041
AREA CODE 914

June 24, 1981

Mr. David Tomey
U. S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts 02254

Re: Draft Programmatic Environmental Impact
Statement for Disposal of Dredged
Material in the Long Island Sound Region

Dear Mr. Tomey:

I wish to go on record as strongly urging the following:

1. Western Long Island Sound should be re-opened for dumping of dredged spoils at least from adjacent areas.
2. Specifically, Site E (identified in the Draft Environmental Impact Statement and known as that portion of Eatons Neck lying in Connecticut State Waters) should be re-opened immediately to dumping of dredged spoils.
3. Additional Environmental Impact Statements should be undertaken by the Army Corps of Engineers to locate additional dumping sites in Western Long Island Sound Waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island, and Eatons Neck West dump site.
4. That the concept of non-Federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.
5. More emphasis be given to the needs of the Sound Shore communities of Western Long Island Sound encompassing lower Connecticut, Westchester County, as well as those portions of Long Island Sound and New York City in the same vicinity.

THE FRIENDLY VILLAGE

U.S. Army Corps of Engineers
New England Division

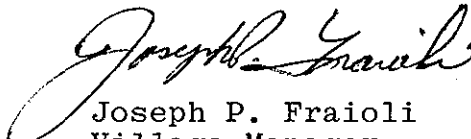
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June 24, 1981

6. The figures of estimated dredging for the next fifty years in the Draft Environmental Impact Statement for the Westchester area be increased from 250,000 cubic yards to 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than the Federal government.

I hope these comments prove helpful in speeding the final Environmental Impact Statement. The re-opening of dump sites in the Western Section of Long Island Sound is critical and I strongly urge that Site E be reactivated immediately.

Very truly yours,



Joseph P. Fraioli
Village Manager

JPF:jd

cc: Mayor and Board
Attorney
Engineer
Clerk-Treasurer
Harbor Commission
The Daily Times
The Sound View News



L7

DEPARTMENT OF PARKS,
RECREATION & CONSERVATION

JOSEPH M. CAVERLY
Commissioner

ROBERT E. DISPENZA
Deputy Commissioner

June 23, 1981

JAMES E. ARLES
Deputy Commissioner

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts 02254

Dear Mr. Tomey:

Re: Draft Programmatic Environmental Impact Statement
for Disposal of Dredged Material in the Long Island
Sound Region

Recreational boating is of great concern to this department. We wish to go on record as strongly urging the following:

1. Western Long Island Sound should be reopened for dumping of dredged spoils at least from the adjacent areas.
2. Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck East, lying in Connecticut State Waters) should be reopened immediately to dumping of dredged spoils.
3. Additional EIS's should be undertaken by the Army Corps of Engineers to locate additional dumping sites in Western Long Island Sound Waters. Deep hole areas which should be considered include Throgs Neck Bridge; between Execution Rock and Larchmont Harbor, near Davis Island; and Eatons Neck West dump site.
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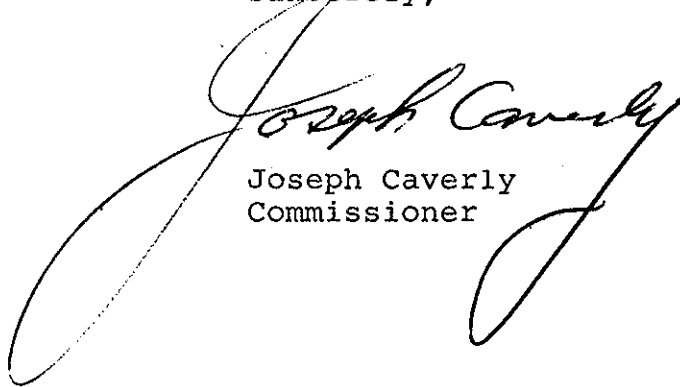
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6. The figures of estimated dredging for the next fifty years in the Draft EIS for the Westchester area be increased from 250,000 cubic yards to 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than the Federal government.

We hope these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the Western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Sincerely,

A large, stylized handwritten signature in dark ink, appearing to read "Joseph Caverly". The signature is written over the typed name and title.

Joseph Caverly
Commissioner

cc: J. R. Dolan
Executive Officer



WESTCHESTER COUNTY BOARD OF LEGISLATORS

803 COUNTY OFFICE BUILDING
WHITE PLAINS, NEW YORK 10601
(914) 682-7650

DIANE A. KEANE
Legislator, 7th District
290 NORTH STREET
Rye, New York 10580
Tel: 967-0589

Member
Committee on Legislation
Committee on Community Affairs,
Health and Hospitals
Trustee
Council for the Arts
in Westchester

June 29, 1981

Mr. David Tomey
U.S. Army Corps. of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts, 02254

Re: Draft Programmatic Environmental
Impact Statement for Disposal of Dredged
Material in the Long Island Sound Region

Dear Mr. Tomey:

I represent the Long Island Sound Shore area of Rye, Mamaroneck and Larchmont. The Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Materials in the Long Island Sound region concerns me. Following are my comments:

As you realize, on a regular basis materials must be dredged from the harbors of the communities I represent. If not dredged, the harbors silt up and navigation is restricted to the detriment of businesses, residential land owners, boat owners and marine police.

Dredging together with the disposal of the dredged spoils is extremely expensive. The dredging costs cannot be substantially changed. However, the cost of dumping of the dredged materials is a variable expense - if the spoils must be removed to a distant point at sea, the price is horrendously high whether it be federally subsidized, municipally paid or a private landowner's project.

Because of this financial burden to eastern Sound Shore communities, I appeal to you to re-open dumping sites on the western side of Long Island Sound, specifically Site E (Eaton's Neck East lying in Connecticut waters) and urge you further to identify other deep sites in the sound where dumping could take place.

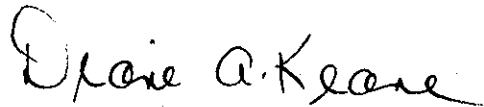
PAGE TWO

Mr. David Tomey
June 29, 1981

The Corps of Engineers cannot ignore the short and long-range federal and non-federal, fiscal implications of closing disposal sites in the western part of Long Island Sound. It is critically important to Westchester County's sound shore communities that you reactivate Site E as soon as possible.

Thank you for your consideration.

Very truly yours,



Diane A. Keane
County Legislator
Seventh District

DAK/tw

cc: Daniel S. Natchez
Joseph Fraioli



OFFICE OF THE SUPERVISOR

TOWN OF RYE
10 PEARL STREET
PORT CHESTER, N. Y. 10573

ANTHONY J. POSILLIPO
SUPERVISOR

June 29, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass.

RE: Draft Programmatic Environmental
Impact Statement For Disposal of
Dredged Material In The Long Island
Sound Region.

Dear Mr. Tomey:

I wish to go on record as strongly urging the following:

- 1/ Western Long Island Sound should be re-opened for dumping of dredged spoils at least for the adjacent areas.
- 2/ Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck East lying in Connecticut State Waters) should be reopened immediately to dumping of dredged spoils.
- 3/ Additional EIS's should be undertaken by the Army Corps of Engineers to locate additional sites in Western Long Island Sound Waters. Deep hole areas which should be considered ~~included~~ Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island, and Eatons Neck West dump site.
- 4/ That the concept of non-Federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.
- 5/ More emphasis be given to the needs of the Sound Shore Communities of Western Long Island Sound encompassing lower Connecticut, Westchester County as well as those portions of Long Island Sound and New York City in the same vicinity.
- 6/ The figures of estimated dredging for the next fifty years in the Draft EIS for the Westchester Area be increased from 250,000 cubic yards to 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing main-



OFFICE OF THE SUPERVISOR

TOWN OF RYE
10 PEARL STREET
PORT CHESTER, N. Y. 10573

ANTHONY J. POSILLIPO
SUPERVISOR

tenance dredging by entities other than the Federal government.

I hope these comments prove helpful in speeding final EIS which is long overdue. The reopening of the dump sites in the Western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Sincerely,

Anthony J. Posillipo
Anthony J. Posillipo
Supervisor

AJP:dp



CITY OF RYE

CITY HALL
RYE, NEW YORK 10580

TELEPHONE
914-967 5400

June 30, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts 02254

Re: Draft Programmatic Environmental Impact
Statement for Disposal of Dredged Material
in the Long Island Sound Region.

Dear Mr. Tomey:

The City of Rye wishes to go on record as strongly urging the following:

1. Western Long Island Sound should be reopened for dumping of dredged spoils at least from the adjacent areas.
2. Specifically, Site E (identified in the Draft EIS and known as that portion of Eaton's Neck East lying in Connecticut State waters) should be reopened immediately to dumping of dredged spoils.
3. Additional EIS's should be undertaken by the Army Corps of Engineers to locate additional dumping sites in Western Long Island Sound waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island and Eaton's Neck West dump site.
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5. More emphasis be given to the needs of the Sound Shore communities of Western Long Island Sound encompassing lower Connecticut and Westchester County, as well as those portions of Long Island Sound and New York City in the same vicinity.

- 2 -

6. The figures of estimated dredging for the next fifty years in the Draft EIS for the Westchester area be increased from 250,000 cubic yards to 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included, representing maintenance dredging by entities other than the Federal Government.

We hope these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Yours Sincerely,



Philip J. McGovern
Acting City Manager

PJMcG:nm



TOWN/VILLAGE OF HARRISON

MUNICIPAL BUILDING
HARRISON, NEW YORK 10528

Telephone: 914-835-2000

JOHN A. PASSIDOMO
SUPERVISOR/MAYOR

July 1, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Dear Mr. Tomey:

Re: Draft Programmatic Environmental Impact
Statement for Disposal of Dredged Material
in the Long Island Sound region

The Town of Harrison wishes to go on record with the following comments regarding the dumping of dredged spoils:

1. The buildup of silt and spoils along the harbors and channels along our coast of the Long Island Sound is increasing at an alarming rate. There is a definite and identified urgent need to dredge these areas. The problem, of course, is what to do with that material. Land disposal sites in the Westchester area are almost non-existent, either for governmental projects or for the private sector.

2. Re-opening the western Long Island Sound area for dredged spoils should be allowed immediately for dumping by the adjacent communities.

Specifically, we urge that Site E, as identified in the draft E.I.S. and known as that portion of Eatons Neck East, lying in Connecticut state waters, should be re-opened immediately for such dumping.

3. We urge that additional Environmental Impact Studies be initiated to find additional dumping sites for the western Long Island Sound. We have been informed that there are deep hole areas near the Throgs Neck Bridge, near Davis Island and additionally the Eatons Neck West area. We urge that studies be started immediately in these areas. The re-opening of Site E will be of immediate assistance to the Sound shore communities, but we need a long-range solution.

TOWN/VILLAGE OF HARRISON

(Continued)

2

Mr. David Tomey

July 1, 1981

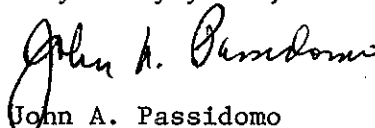
4. We believe that consideration should also be given to the concept of dredging by either local government or the private sector in the areas that lie between the federal maintenance area and the shore line for long-term planning.

5. Furthermore, we believe that the estimate of 250,000 cubic yards of spoils during the next fifty years is an understatement. We urge that that figure be increased to one million cubic yards for federal maintenance dredging. Additionally, we believe it will be essential to have provision made for another four million cubic yards of spoils which would be dredged by entities other than the federal government.

I sincerely hope that the final E.I.S. will soon be prepared. The re-opening of the dump sites in the western section of Long Island Sound is of vital importance to the area. Any delay will only create more and more difficulties.

We strongly urge that Site E be reactivated immediately, if necessary without waiting for the final draft of the E.I.S.

Very truly yours,



John A. Passidomo
Supervisor/Mayor

JAP/sr

SHORE ACRES POINT CORPORATION
c/o 555 ALDA ROAD
MAMARONECK, NEW YORK 10543

June 16, 1981

Mr. David Tomey
U.S. Army Corps. of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Re: Draft Programmatic Environmental
Impact Statement for Disposal of Dredged
Material in the Long Island Sound region

Dear Mr. Tomey:

I am writing this letter on behalf of Shore Acres Point Corporation and twenty two other individuals, corporations, organizations, marine and clubs, all of whom are land owners surrounding the Mamaroneck Harbor. We welcome this opportunity to comment on the Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound region.

One of the most serious problems facing the Sound Shore Communities of Westchester and other areas on Western Long Island Sound is the increasingly critical need for dredging the harbors, waterways, and marine recreational areas; and the disposal of such dredged spoils at a reasonable cost and in an environmentally acceptable manner. We wish to go on record as strongly urging the following:

- 1) Western Long Island Sound should be re-opened for dumping of dredged spoils at least from the adjacent areas.
- 2) Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck East lying in Connecticut State Waters) should be reopened immediately to the dumping of dredged spoils.
- 3) Additional EIS's should be undertaken by the Army Corps. of Engineers to locate additional dumping sites in Western New York State Long Island Sound waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near David's Island, and Eatons Neck West dump site.
- 4) That the concept of non-Federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.

- 5) More emphasis be given to the needs of the Sound Shore Communities of Western Long Island Sound encompassing lower Connecticut, Westchester County as well as those portions of Long Island and New York City in the same vicinity.
- 6) The figures of estimated dredging for the next fifty years in the Draft EIS for the Westchester area be increased from 250,000 cubic yards to at least 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than the federal government.

Upland disposal sites in the Westchester area are virtually non-existent for either governmental or non-governmental potential dredging projects. The only two alternatives are ocean disposal or Long Island Sound disposal. Ocean disposal requires a specific type of barge equipment which has limited availability in New York. The cost of using such equipment is significantly more expensive than other types of barge disposal equipment. Also, limitation on the number of trips per day and number of barges per day that can go through Hell's Gate further increases the costs of dredging. In a recent project in Westchester, costs were estimated to be increased by over 50% as the result of ocean disposal.

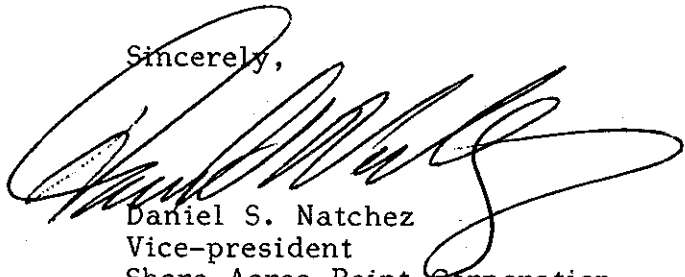
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We are further concerned that very little emphasis has been given to the needs of the Western area of Long Island Sound. In short, one can feel like an unwanted child. We suggest that the EIS be finalized without delay and that additional EIS' be commenced on additional dumping sites in Western Long Island Sound - New York State waters. This search should include a review of such deep hole areas as Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near David's Island off New Rochelle, and Eatons Neck West.

Two major shortcomings of the present Draft EIS are that only Federal maintenance dredging is considered, thus excluding other non-Federal maintenance dredging figures, and the extremely low estimates for the next fifty years of the amount of Federal maintenance dredging that will be done in the Westchester area. It is shortsighted at best to look only at Federal projects. Unless the area from the shore line to the channel and Federal anchorage areas is dredged, boats will not be able to get to shore. Therefore, the Federal dredging is only partially solving the problems that exist and the amount of non-Federal dredging in many cases will be four times or more than of the Federal projects. In Mamaroneck, the Federal project just completed was approximately 20,000 cubic yards and the amount of non-Federal dredging will be approximately 80,000 cubic yards. Table C-15 grossly understates the amount of Federal maintenance dredging to be undertaken in the next fifty years. Mamaroneck Harbor (based upon the just completed project) should run approximately 120,000 cubic yards. Milton Harbor, Larchmont Harbor, and Echo Bay show no dredging over the next fifty years. Yet the Federal government is going to public notice shortly for a large project in Milton Harbor. New Rochelle shows nominal dredging as does Portchester. In short the total figures for the Federal maintenance dredging should be estimated at over 1,000,000 cubic yards without any of the non-Federal work which could run over four times the Federal projections, or 4,000,000 cubic yards.

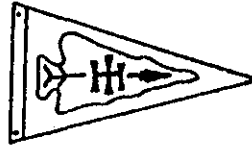
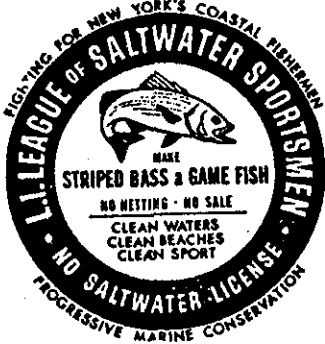
We hope that these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Sincerely,



Daniel S. Natchez
Vice-president
Shore Acres Point Corporation
On behalf of
Shore Point Acres Corporation
et. al.

HARBOR ISLAND BOAT CLUB INCORPORATED
Mamaroneck, New York



June 15, 1981

Mr. David Tomey
U.S. Army Corps. of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

RE: Draft Programmatic Environmental
Impact Statement for disposal of
dredged material in the Long Island
Sound Region.

Dear Mr. Tomey:

One of the most serious problems facing Sound Shore Communities of Westchester and other areas on Western Long Island Sound is the increasingly critical need for dredging the harbors, waterways, and marine recreational areas; and the disposal of such dredged spoils at a reasonable cost and in an environmentally acceptable manner. We wish to go on record as strongly urging the following:

1. Western Long Island Sound should be re-opened for dumping of dredged spoils at least from the adjacent areas.
2. Specifically, site E (identified in the Draft EIS and known as that portion of Eastons Neck East lying in Connecticut State waters) should be reopened immediately to the dumping of dredged spoils.
3. Additional EIS's should be undertaken by the Army Corps. of Engineers to locate additional dumping sites in Western New York State Long Island Sound waters. Deep hole areas which should be considered include Throngs Neck Bridge, between Execution Rock and Larchmont Harbor, new Davis Island, and Easton's Neck West dump site.
4. That the concept of non-Federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.
5. More emphasis be given to the needs of the Sound Shore communities of Western Long Island Sound encompassing lower Connecticut, Westchester County as well as those portions of Long Island and New York City in the same vicinity.

continued....

6. The figures of estimated dredging for the next fifty years in the Draft EIS for the Western area be increased from 250,000 cubic yards to at least 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than the federal government.

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If one turns from ocean disposal to Long Island Sound, the distance from Westchester Sound Shore Communities to the nearest approved active dredged site is off the New Haven, Connecticut some 45-50 miles away. The cost savings for Westchester or nearby Long Island projects using New Haven vs. ocean disposal should be \$2.00 to \$4.00 per cubic yard. However, if this excessive distance were reduced by a closer site--such as Site E (Eaton's Neck East) the cost savings should be increased an additional \$1.50 to \$3.00 per cubic yard. This could mean a total savings of \$3.00 to \$7.00 per cubic yard over ocean disposal or \$300,000 to \$700,000 for each 100,000 cubic yards dredged. (This cost information was estimated within the last three months by two dredge contractors certified for both ocean and Long Island Sound dumping). It should be noted that opening of Site E (Eaton's Neck East) would mean that the distance from the Westchester and nearby Long Island Sound Shore Communities to the nearest approved disposal area would be in line with distances to other regional sites from neighboring Long Island Sound Communities. (This can be seen Figure 2 of the Draft EIS)

We are further concerned that very little emphasis has been given to the needs of the Western area of Long Island Sound. In short, one can feel like an unwanted child. We suggest that the EIS be finalized without delay and that additional EIS' be commenced on additional dumping sites in Western Long Island Sound-New York State waters. This search should include a review of such deep hole areas as Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, new Davis Island off New Rochelle and Eatons Neck West.

Two major shortcomings of the present Draft EIS are that only Federal maintenance dredging is considered, thus excluding other non-Federal maintenance dredging figures, and the extremely low estimates for the next fifty years of the amount of Federal maintenance dredging that will be done in the Westchester area. It is shortsighted at best to look only at Federal projects. Unless the area from the shore line to the channel and Federal anchorage areas is dredged, boats will not be able to get to shore. Therefore, the Federal dredging is only

page 3.

partially solving the problems that exist and the amount of Non-Federal dredging in many cases will be four times or more than of the Federal projects. In Mamaroneck, the Federal project just completed was approximately 20,000 cubic yards and the amount of non-Federal dredging will be approximately 80,000 cubic yards. Table C-15 grossly understates the amount of Federal maintenance dredging to be undertaken in the next fifty years. Mamaroneck Harbor (based upon the just completed project) should run approximately 120,000 cubic yards. Milton Harbor, Larchmont Harbor, and Echo Bay show no dredging over the next fifty years. Yet The Federal government is going to public notice shortly for a large project in Milton Harbor. New Rochelle shows nominal dredging as does Portchester. In short the total figures for the Federal government maintenance dredging should be estimated at over 1,000,000 cubic yards without any of the non-Federal work which could run over four times the Federal projections, or 4,000,000 cubic yards.

We hope that these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Sincerely,

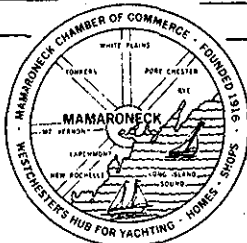
A handwritten signature in cursive script, appearing to read "Al Decker".

MAMARONECK CHAMBER OF COMMERCE, INC.

698-4400

1058 MAMARONECK AVENUE

MAMARONECK, NEW YORK 10543



June 24, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Re: Draft Programmatic Environmental Impact Statement for Disposal
of Dredged Material in the Long Island Sound Region

Dear Mr. Tomey:

We wish to go on record as strongly urging the following:

- 1) Western Long Island Sound should be re-opened for dumping of dredged spoils at least from the adjacent areas.
- 2) Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck East lying in Connecticut State Waters) should be reopened immediately to dumping of dredged spoils.
- 3) Additional EIS's should be undertaken by the Army Corps of Engineers to locate additional dumping sites in Western Long Island Sound waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near David Island, and Eatons Neck West dump site.
- 4) That the concept of non-Federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.
- 5) More emphasis be given to the needs of the Sound Shore Communities of Western Long Island Sound encompassing lower Conn., Westchester County as well as those portions of L.I. Sound and New York City in the same vicinity.
- 6) The figures of estimated dredging for the next fifty years in the Draft EIS for the Westchester area be increased from 250,000 cubic yards to 1,000,000 cubic yards for the Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than the Federal government.

-2-

We hope these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the Western section of Long Island Sound is critical and we strongly urge the Site E be reactivated immediately.

Sincerely,

A handwritten signature in cursive script, appearing to read "George H. Straub".

George H. Straub
Executive Director

GHS:kj

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65 PURDY STREET
 HARRISON, NEW YORK 10528

June 15, 1981

Mr. David Tomey
 U.S. Army Corps, of Engineers
 New England Division
 424 Trapelo Road
 Waltham, Mass. 02254

RE: Draft Programmatic Environmental
 Impact Statement for disposal of
 dredged material in the Long Island
 Sound Regions.

Dear Mr. Tomey:

One of the most serious problems facing the Sound Shore Communities of Westchester and other areas on Western Long Island Sound is the increasingly critical need for dredging the harbors, waterways, and marine recreational areas; and the disposal of such dredged spoils at a reasonable cost and in an environmentally acceptable manner. We wish to go on record as strongly urging the following:

1. Western Long Island Sound should be re-opened for dumping of dredged spoils at least from the adjacent areas.
2. Specifically, Site E (identified in the Draft EIS and known as that portion of Eastons Neck East lying in Connecticut state waters) should be reopened immediately to the dumping of dredged spoils.
3. Additional EIS should be undertaken by the Army Corps. of Engineers to locate additional dumping sites in Western New York State Long Island Sound waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island, and Eatons Neck West dump site.
4. That the concept of non-Federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.
5. More emphasis be given to the needs of the Sound Shore communities of Western Long Island Sound encompassing lower Connecticut, Westchester County as well as those portions of Long Island and New York City in the same vicinity.

continued

page 2 .

6. The figures of estimated dredging for the next fifty years in the Draft EIS for the Western area be increased from 250,000 cubic yards to at least 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than the federal government.

Upland disposal sites in the Westchester area are virtually non-existent for either governmental or non-governmental potential dredging projects. The only two alternatives are ocean disposal or Long Island Sound disposal. Ocean disposal requires a specific type of barge equipment which has limited availability in New York. The cost of using such equipment is significantly more expensive than other types of barge disposal equipment. Also, limitation on the number of trips per day and number of barges per day that can go through Hell's Gate further increases the costs of dredging. In a recent project in Westchester, costs were estimated to be increased by over 50% as the result of ocean disposal.

If one turns from ocean disposal to Long Island Sound, the distance from Westchester Sound Shore Communities to the nearest approved active dredged site is off the New Haven, Connecticut some 45-50 miles away. The cost savings for Westchester or nearby Long Island projects using New Haven vs. ocean disposal should be \$2.00 to \$4.00 per cubic yard. However, if this excessive distance were reduced by a closer site--such as Site E (Eaton's Neck East) the cost savings should be increased an additional \$1.50 to \$3.00 per cubic yard. This could mean a total savings of \$3.00 to \$7.00 per cubic yard over ocean disposal or \$300,000 to \$700,000 for each 100,000 cubic yards dredged. (This cost information was estimated within the last three months by two dredge contractors certified for both ocean and Long Island Sound dumping). It should be noted that opening of Site E (Easton's Neck East) would mean that the distance from the Westchester and nearby Long Island Sound Shore Communities to the nearest approved disposal area would be in line with distances to other regional sites from neighboring Long Island Sound Communities. (This can be seen Figure 2 of the Draft EIS)

We are further concerned that very little emphasis has been given to the needs of the Western area of Long Island Sound. In short, one can feel like an unwanted child. We suggest that the EIS be finalized without delay and that additional EIS' be commenced on additional dumping sites in Western Long Island Sound-New York State waters. This search should include a review of such deep hole areas as Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, new Davis Island off New Rochelle and Eatons Neck West.

Two major shortcomings of the present Draft EIS are that only Federal maintenance dredging is considered, thus excluding other non-Federal maintenance dredging figures, and the extremely low estimates for the next fifty years of the amount of Federal maintenance dredging that will be done in the Westchester area. It is shortsighted at best to look only at Federal projects. Unless the area from the shore line to the channel and Federal anchorage areas is dredged, boats will not be able to get to shore. Therefore, the Federal dredging is only

page 3.

partially solving the problems that exist and the amount of Non-Federal dredging in many cases will be four times or more than of the Federal projects. In Mamaroneck, the Federal project just completed was approximately 20,000 cubic yards and the amount of non-Federal dredging will be approximately 80,000 cubic yards. Table C-15 grossly understates the amount of Federal maintenance dredging to be undertaken in the next fifty years. Mamaroneck Harbor (based upon the just completed project) should run approximately 120,000 cubic yards. Milton Harbor, Larchmont Harbor, and Echo Bay show no dredging over the next fifty years. Yet The Federal government is going to public notice shortly for a large project in Milton Harbor. New Rochelle shows nominal dredging as does Portchester. In short the ~~total~~ figures for the Federal government maintenance dredging should be estimated at over 1,000,000 cubic yards without any of the non-Federal work which could run over four times the Federal projections, or 4,000,000 cubic yards.

We hope that these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Sincerely,

Edward K. Kaula
Sec/Tres.

Roger M. Spoto
2307 Palmer Avenue
New Rochelle, New York 10801

June 24, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Re: Draft Programmatic
Environmental Impact
Statement for Disposal
of Dredged Material in
The Long Island Sound
Region.

Dear Mr. Tomey:

This letter represents my thoughts and those of Mr. Robert Kohlasch, owner of Echo Bay Boat Yard in New Rochelle.

The critical need for dredging the harbors and waterways of western Long Island Sound communities has been voiced by many concerned people over the years. It is the responsibility of the Corps of Engineers to look at the economics of the situation and to separate the political impact from the environmental impact. Much has been made of the "Long Island Opposition" to dredge spoil disposal in Long Island Sound. As an environmentalist, I am concerned with cost factors, environmental integrity and its impact on peoples lives. Recreational boating is a major factor in the decision over dredging and disposal but commercial interests must not be neglected. Mr. Kohlasch has spent his entire life working as a boat yard operator and craftsman on the New Rochelle waterfront. He has attempted to have the Corps declare the west branch of Echo Bay as Federal Channel to allow his customers access to the Sound at any tide. After a lengthy study, the Corps has determined that the project is not economically justified because the cost/benefit ratio is unfavorable. It is due to the fact that ocean disposal was the only option left. There are no upland sites available and Long Island Sound sites have been closed for some time.

If dumping sites in the western portion of Long Island Sound are not opened, it will be a major setback for many people. What about alternatives? The Corps has

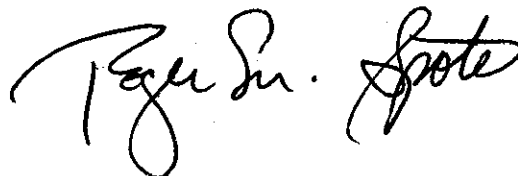
Roger M. Spoto
2307 Palmer Avenue
New Rochelle, New York 10801

mentioned "capping" procedures in its various reports on the Sound over the years. Has this been taken into account? Could this be instituted at Site E (as identified in the Draft EIS) to prevent harm to the marine environment? If volume dumping is seen as a problem, why not ask (or empower) the governors of New York and Connecticut (or the DEP and DEC agency commissioners) to review on a case-by-case basis any request to dump at an approved disposal area in western Long Island Sound. In addition, we feel that there is a need and an obligation to create EIS's for alternative sites such as Execution Light and Eatons Neck West. Table C-15 of the Draft EIS shows no project or projected volume of dredged material for Echo Bay. Is this not cart before the horse thinking? The aforementioned project to extend Federal Channel into the west branch of Echo Bay was denied because of a lack of dump sites in western Long Island Sound. Give me that site and I'll give you some volume figures. Towing dredge spoil to New Haven or the ocean dump site is economically impossible for most small operators in Westchester. There are alternative sites and methods of disposal. It is the obligation of the Corps of Engineers to find them.

The fate of many commercial and recreational interests is in your hands. I hope you will realize the importance of finding alternative western Sound sites and move accordingly.

Thank you for your consideration.

Sincerely,



Neil Underberg
480 Park Avenue
New York, New York 10022

June 25, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts 02254

RE: Draft Programmatic Environmental Impact
Statement for Disposal of Dredged Material
in the Long Island Sound Region

Dear Mr. Tomey:

I wish to go on record as strongly urging the following:

- 1) Western Long Island Sound should be re-opened for dumping of dredged spoils at least from the adjacent areas.
- 2) Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck East lying in Connecticut State Waters) should be re-opened immediately to dumping of dredged spoils.
- 3) Additional EIS's should be undertaken by the Army Corps of Engineers to locate additional dumping sites in Western Long Island Sound Waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near Davis Island, and Eatons Neck West dump site.
- 4) That the concept of non-Federal dredging between the Federal maintenance areas and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.

P6

Mr. David Tomey
June 25, 1981
Page 2

5) More emphasis be given to the needs of the Sound Shore Communities of Western Long Island Sound encompassing lower Connecticut, Westchester County as well as those portions of Long Island Sound and New York City in the same vicinity.

6) The figures of estimated dredging for the next fifty years in the Draft EIS for the Westchester area be increased from 250,000 cubic yards to 1,000,000 cubic yards for Federal maintenance dredging and an additional 4,000,000 cubic yards be included representing maintenance dredging by entities other than the Federal government.

I hope these comments prove helpful in speeding the final EIS which is long overdue. The re-opening of dump sites in the Western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Sincerely,


Neil Underberg

NU:lh

Family Circle

488 Madison Avenue, New York, N.Y. 10022

June 24, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, MA 02254

RE: Draft Programmatic Environmental Impact Statement for Disposal
of Dredged Material in the Long Island Sound Region

Dear Mr. Tomey:

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- 1) Western Long Island Sound should be reopened for dumping of dredged spoils at least from the adjacent areas.
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(continued on next page)

Mr. David Toney
June 24, 1981
Page Two

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Sincerely,

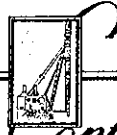


Arthur M. Hettich
Editor-in-Chief

AMH/mh

F E H L H A B E R CORPORATION

587 FIFTH AVENUE • NEW ROCHELLE, N. Y. 10801

*Contracting Engineers*
(914) 632-1000

June 29, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Re: Draft Programmatic Environmental Impact Statement for Disposal
of Dredged Material in the Long Island Sound Region

Dear Mr. Tomey:

We wish to go on record as strongly urging the following:

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Mr. David Tomey

June 29, 1981

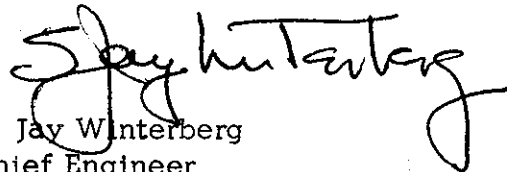
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We hope these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the Western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Very truly yours,

FEHLHA BER CORPORATION



S. Jay Winterberg
Chief Engineer

SJW/bg

GEOFFREY L. PHILLIPS
27 BRETTON ROAD
SCARSDALE, NEW YORK 10583

July 2, 1981

Mr. David Tomey
U. S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts 02254

RE: DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT
STATEMENT FOR DISPOSAL OF DREDGED MATER-
IAL IN THE LONG ISLAND SOUND REGION

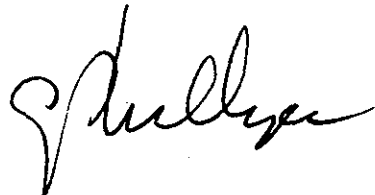
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I hope these comments prove helpful in speeding the final EIS which is long overdue. The re-opening of dump sites in the Western section of Long Island Sound is critical.

Sincerely yours,



GLP/rec

June 30, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Re: Draft Programmatic Environmental Impact
Statement for Disposal of Dredged Material
in the Long Island Sound Region

Dear Mr. Tomey:

I wish to go on record as strongly urging the following:

1. Western Long Island Sound should be re-opened for dumping of dredged spoils at least from the adjacent areas.
2. Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck East lying in Connecticut State Waters) should be re-opened immediately to dumping of dredged spoils.
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5. More emphasis be given to the needs of the Sound Shore Communities of Western Long Island Sound encompassing lower Conn., Westchester County as well as those portions of L.I. Sound and New York City in the same vicinity.
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I hope these comments prove helpful in speeding the final EIS which is long overdue. The re-opening of dump sites in the Western section of Long Island Sound is critical and I strongly urge that Site E be reactivated immediately.

Sincerely,

Mary Monte-Sano

914 969-1700
212 568-5800



FACTORIES:
Yonkers, N. Y. 10701
Buffalo, N. Y. 14212

THE MAUTNER COMPANY, INC.

MANUFACTURERS OF
JEWELRY BOXES, SHOWCASE TRAYS & WINDOW DISPLAYS
498 NEPPERHAN AVE., YONKERS, N. Y. 10701

June 22, 1981

Mr. David Tomey
U.S. Army Corps. of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Dear Mr. Tomey:

Re: Draft Programmatic Environmental
Impact Statement for Disposal of Dredged
Material in the Long Island Sound Region

We are taking this opportunity to comment on the Draft Programmatic Environmental Impact Statement for the Disposal of Dredged Material in the Long Island Sound region.

One of the most serious problems facing the Long Island Sound Shore Communities of Westchester and other areas on Western Long Island Sound, is the increasingly critical need for dredging the harbors, waterways, and marine recreational areas; and the disposal of such dredged spoils at a reasonable cost, and in an environmentally acceptable manner. We wish to go on record as strongly urging the following:

- 1) That Western Long Island Sound ^{DUMP SITES} should be re-opened for dumping of dredged spoils at least from the adjacent areas.
- 2) That Site "E" (identified in the Draft EIS, and known as that portion of Eatons Neck East lying in Connecticut State Waters) should be re-opened immediately to the dumping of dredged spoils.
- 3) That additional EIS's should be undertaken by the Army Corps. of Engineers to locate additional dumping sites in Western New York State Long Island Sound waters. Deep hole areas, which should be considered, include the Throgs Neck Bridge and between Execution Rock and Larchmont Harbor, near David's Island, and the Eatons Neck West dump site.
- 4) That the concept of non-Federal dredging projects between the Federal channel lines and shoreline be given more emphasis and consideration in long range planning for the dumping of dredged spoils.
- 5) That more emphasis be given to the needs of the Sound Shore Communities of Western Long Island Sound encompassing lower Connecticut, Westchester County, as well as those portions of Long Island in the same vicinity.

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THE MAUTNER COMPANY, INC.

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We are further concerned that very little emphasis has been given to the needs of the Western area of Long Island Sound. We suggest that the EIS be finalized without delay, and that additional EIS's be commenced on additional dumping sites in Western Long Island Sound - New York State waters. This search should include a review of such deep hole areas as near the Throgs Neck Bridge, between Execution Rock and Larchmont Harbor, near David's Island off New Rochelle, and Eatons Neck West.

Two major shortcomings of the present Draft EIS are that only Federal maintenance dredging is considered, thus excluding other non-Federal maintenance dredging figures, and the extremely low estimates for the next fifty years of the amount of Federal maintenance dredging that will be done in the Westchester area. It is shortsighted, at best, to look only at Federal projects. Unless the area from the shore line to the channel and Federal anchorage areas is dredged, boats will not be able to get to shore. Therefore, the Federal dredging is only partially solving the problems that exist, and the amount of non-Federal dredging in many cases will be four times or more than that of the Federal projects. In Mamaroneck, the Federal project just completed was approximately 20,000 cubic yards, and the amount of non-Federal dredging will be approximately 80,000 cubic yards. Table C-15 grossly understates the amount of Federal maintenance dredging to be undertaken in the next fifty years.

THE MAUTNER COMPANY INC.

Mamaroneck Harbor (based upon the just completed project) should run approximately 120,000 cubic yards. Milton Harbor, Larchmont Harbor, and Echo Bay show no dredging over the next fifty years. Yet the Federal government is going to public notice shortly for a large project in Milton Harbor. New Rochelle shows nominal dredging as does Portchester. In short, the total figures for the Federal maintenance dredging should be estimated at over 1,000,000 cubic yards without any of the non-Federal work which could run over four times the Federal projections, or 4,000,000 cubic yards.

We hope that these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the western section of Long Island Sound is critical, and we strongly urge that Site E be reactivated immediately.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Jay Mautner", with a stylized, flowing script.

J. Jay Mautner

JJM/ld

Victor J. Fink
636 Shore Acres Drive
Mamaroneck, New York 10543

June 29, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, MA 02254

Re: Draft Programmatic Environmental
Impact Statement for Disposal of
Dredged Material in the Long
Island Sound Region.

Dear Mr. Tomey:

I wish to go on record as strongly urging the following:

- 1) Western Long Island Sound should be reopened for dumping of dredged spoils at least from the adjacent areas.
- 2) Specifically, Site E (identified in the Draft EIS and known as that portion of Eatons Neck East lying in Connecticut State Waters) should be reopened immediately to dumping of dredged spoils.
- 3) Additional EIS's should be undertaken by the Army Corps of Engineers to locate additional dumping sites in Western Long Island Sound Waters. Deep hole areas which should be considered include Throgs Neck Bridge, between Execution Rock and Larchmont Harbor near Davis Island, and Eatons Neck West dumpsite.
- 4) That the concept of non-Federal dredging between the Federal Maintenance areas and shoreline be given more emphasis and consideration in long-range planning for the dumping of dredged spoils.
- 5) More emphasis be given to the needs of the Sound Shore communities of Western Long Island Sound encompassing lower Connecticut, Westchester County, as well as those portions of Long Island Sound and New York City in the same vicinity.

The reopening of dump sites in the Western section of Long Island Sound is critical and I strongly urge that SITE "E" BE REACTIVATED IMMEDIATELY.

Sincerely,


Victor J. Fink

VJF/jm

BEVIN D. KOEPPPEL

26 BROADWAY

NEW YORK, N. Y. 10004

212-344-2150

June 30, 1981

P13

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Massachusetts 02254

Re: Draft Programmatic Environmental Impact Statement for
Disposal of Dredged Material in the Long Island Sound Region

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Very truly yours,



BDK:cd

June 30, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

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Statement for Disposal of Dredged Material
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Sincerely,

Jucent Monte Sano

625 Guion Drive
Mamaroneck, New York 10543
July 1, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass 02254

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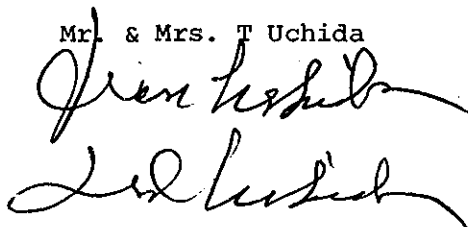
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Sincerely,

Mr. & Mrs. T Uchida

The block contains two handwritten signatures in dark ink. The top signature is a cursive script that appears to read 'T. Uchida'. The bottom signature is also in cursive, appearing to read 'Mrs. T. Uchida'. Both signatures are fluid and connected.

Phone: 914 967-4120

Leonard M. Feltman
Seville Avenue
Rye, New York 10580

June 25, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Re: Draft Programmatic Environmental
Impact Statement for Disposal of
Dredged Material in the Long Island
Sound Region.

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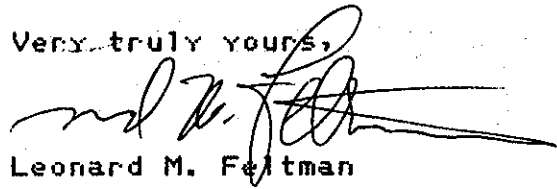
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ursee that Site E be reactivated immediately.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Leonard M. Feltman', with a long horizontal flourish extending to the right.

Leonard M. Feltman

LMF/lm

Nichols

YACHT YARDS

June 25, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

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Impact Statement for Disposal of
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(Cont'd)

LOCATIONS

■ NICHOLS, MAMARONECK, N.Y.
500 Rushmore Ave.
Mamaroneck, N.Y. 10543
(914) 698-6065

■ NICHOLS, RYE, N.Y.
101 Hix Ave.
Rye, New York 10580
(914) 967-3464

■ NICHOLS, FLUSHING, N.Y.
World's Fair Marina
Northern Blvd., Flushing, N.Y. 11368
(212) 898-6300

■ NICHOLS, MANHATTAN, N.Y.
Hudson Harbor Boat Basin, Inc.
79th St. & Hudson River
New York, N.Y. 10024
(212) 362-0909

■ NICHOLS, STATEN ISLAND
Great Kills Park Marina
P.O. Box 98
Staten Island, N.Y. 10306
(212) 351-8476

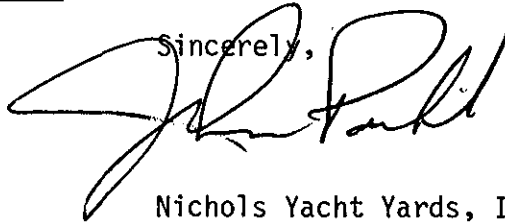
■ NICHOLS BAYSIDE MARINA
Foot of 28th Ave. & Belt Pkwy.
Bayside, N.Y. 11360
(212) 229-9565

-2-

- 5) More emphasis be given to the needs of the Sound Shore Communities of Western Long Island Sound encompassing lower Connecticut, Westchester County as well as those portions of Long Island Sound and New York City in the same vicinity.
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I (we) hope these comments prove helpful in speeding the final EIS which is long overdue. The reopening of dump sites in the Western section of Long Island Sound is critical and we strongly urge that Site E be reactivated immediately.

Sincerely,

A handwritten signature in dark ink, appearing to read 'John Pavlik', written over the word 'Sincerely,'.

Nichols Yacht Yards, Inc.
John Pavlik
Manager

JP:ga

Basil P. Tangredi, D.V.M.

Greenlawn Veterinary Clinic 51 Broadway, Greenlawn, New York 11740 • 757-8700

14 July 1981

C.E. Edgar III, Col.
Dept of Army
New England Division Corps of
Engineers
424 Trapelo Rd
Waltham, Mass 12254

Dear Col. Edgar,

Some six weeks ago I received at my home address (153 Old Winkle Point Dr, Northport, N.Y. 11768) the Programmatic Environmental Impact Statement relating to the subject of dredge spoil disposal in Long Island Sound. While I am generally philosophically opposed to open water dumping, I realize that dredging must take place on both shores of Long Island Sound and that disposal is thus inevitable. The identification of several sites for such disposal in the PEIS would be acceptable for the cleaner materials (Classes I and II). For dredge materials containing significant toxic substances I would endorse the containment facilities outlined in the workshop given last spring in conjunction with the L.I. Sound Taskforce. I realize this latter method entails considerable expense, and the dikes would require ongoing maintenance. However, I believe that any alternative that would expose the marine environment to contamination with these substances would entail greater expense to the economy and public health.

Sincerely,

B. Tangredi

B. Tangredi
Board of Directors of
Lyman Langdon Audubon Soc.

FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG & CASEY

425 PARK AVENUE, NEW YORK, N.Y. 10022

(212) 371-5900

[TELEX 425897 LEGI UI]

CABLE: LENFINLEY, NEW YORK

TELECOPIER (212) 371-3469

FINLEY, KUMBLE, WAGNER, HEINE & UNDERBERG
1401 BRICKELL AVENUE
MIAMI, FLORIDA 33131
(305) 358-8050
TELECOPIER (305) 371-3655

1120 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036
(202) 857-4000
TELECOPIER (202) 857-4410

FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG & MANLEY
2029 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
(213) 557-0111
TELECOPIER (213) 557-0898

July 23, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

Re: Draft Programmatic Environmental
Impact Statement for Disposal of
Dredged Material in the Long Island
Sound Region

Dear Mr. Tomey:

I wish to go on record as strongly urging the following:

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FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG & CASEY

Mr. David Tomey
July 23, 1981
Page 2

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Sincerely,

FINLEY, KUMBLE, WAGNER,
HEINE, UNDERBERG & CASEY

By: 

Scott R. Johnson

SRJ:ao

21 Stuyvesant Ave.
Larchmont, New York 10538
July 23, 1981

Mr. David Tomey
U. S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, MA 02254

RE: Draft Programmatic Environmental Impact
Statement for Disposal of Dredged Material
in the Long Island Sound Region

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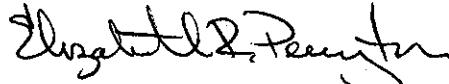
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Sincerely,



Elizabeth R. Pennington

115 East 92nd St.
New York, New York 10028
July 23, 1981

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U. S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, MA 02254

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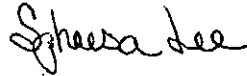
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Mrs. T. Charles Lee

250 East 87th St. Apt. 14H
New York, New York 10028
July 23, 1981

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U. S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, MA 02254

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Kinne S. Yon

Kinne S. Yon

632 Shore Acres Drive
Mamaroneck, New York

P23

July 21, 1981

Mr. David Tomey
U.S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, Mass. 02254

RE: Draft Programmatic Environmental Impact
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in the Long Island Sound Region.

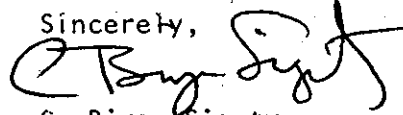
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Sincerely,

C. Birge Sigety

CBS/bw

343 East 30th St. Apt. 16J
New York, New York
July 23, 1981

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U. S. Army Corps of Engineers
New England Division
424 Trapelo Road
Waltham, MA 02254

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Robert G. Sigety
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